Adm. Rec

Step 3: You can click on the "view" button next to a record to access it, or if the view function is not yet available, you can click on the "request" button and IDEM personnel will evaluate the record in 1 to 3 business days and then make the public portions of the record available on this site

Back

Primary Name	Location Address	City	County	Postal Code
DALTON CORPORATION WARSAW MANUFACTURING FACILITY	1900 E JEFFERSON ST	WARSAW	KOSCIUSKO	46580

Program: HW Site Doc Type: Document Date: to

Apply Filter

37 documents

review docs in Chronological order!!

	Document #	Document Date	Program	Document Type	Pages	
view	27957143	03/01/2006	HW Site	OLQ Authorization	2	2
view	29638298	04/17/2008	HW Site	OLQ Authorization	12	3
view	30026283	03/04/2008	HW Site	OLQ Authorization	4	4
view	33068438	08/28/2008	HW Site	OLQ Authorization	4	5
view	30888803	11/09/1998	HW Site	OLQ Correspondence	7	6
view	39139792	08/12/2008	HW Site	OLQ Correspondence	4	7
view	39139796	07/18/2008	HW Site	OLQ Correspondence	6	8
view	39139832	07/23/2008	HW Site	OLQ Correspondence	3	9
view	18940210	06/13/2006	HW Site	OLQ Field Inspections	9	10
view	19141207	09/21/2005	HW Site	OLQ Field Inspections	11	11
view	28773813	02/11/2005	HW Site	OLQ Field Inspections	2	12
view	28773822	03/02/2005	HW Site	OLQ Field Inspections	2	13
view	28773824	10/24/2001	HW Site	OLQ Field Inspections	8	14
view	29271261	10/16/1997	HW Site	OLQ Field Inspections	34	15
view	32505035	06/17/2008	HW Site	OLQ Field Inspections	58	16
view	32888024	09/23/2003	HW Site	OLQ Field Inspections	6	17
view	32917365	06/22/1998	HW Site	OLQ Field Inspections	65	18
view	32933929	10/24/2001	HW Site	OLQ Field Inspections	2	19
view	32988603	04/02/2002	HW Site	OLQ Field Inspections	22	20
view	33047587	09/23/2003	HW Site	OLQ Field Inspections	2	21
view	34324236	08/19/2008	HW Site	OLQ Field Inspections	41	22
view	34866692	08/19/2008	HW Site	OLQ Field Inspections	1	23 — this is an exact copy of (22)
view	26967159	07/25/2003	HW Site	OLQ Monitoring	20	24
view	30888672	01/08/1999	HW Site	OLQ Monitoring	10	25
view	25912474	12/17/1998	HW Site	OLQ Permit	2	26
view	25912593	01/08/1999	HW Site	OLQ Permit	10	27
view	25912603	01/25/1999	HW Site	OLQ Permit	2	28
view	25912605	02/19/1999	HW Site	OLQ Permit	1	29
view	25912606	08/15/2001	HW Site	OLQ Permit	1	30
view	25912607	10/17/2001	HW Site	OLQ Permit	1	31
view	25912608	07/31/2001	HW Site	OLQ Permit	6	32
view	25912649	11/09/2001	HW Site	OLQ Permit	5	33
view	25912654	12/04/2001	HW Site	OLQ Permit	1	34
view	25912660	11/09/2001	HW Site	OLQ Permit	5	35
view	26968394	04/05/2000	HW Site	OLQ Permit	14	36
view	19526142	08/07/2007	HW Site	OLQ Report	16	37
view	28853117	03/04/2002	HW Site	OLQ Report	5	38
37 documents						
23759591		05/01/1990	UST	UST Closure	23	39
15031018		1/23/2007	Commissioner's Corr.	Correspondence	1	1

Optional: Need additional information? Click the link below to fill out a request for additional information that may be related to the targeted facility.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Virtual File Cabinet

(5)

IA Kosciusko

OFFICE OF LAND QUALITY
HAZARDOUS WASTE HANDLER IDENTIFICATION

ID FORM

MAY 23 2005

mpw

(Instructions at www.in.gov/idem/land/hazwaste/fda.html)

	INFORMATION ON FILE as of 05/02/2005	CHANGES NEEDED (please print)
COUNTY	KOSCIUSKO	Reason for submittal: ✓ Subsequent notification to update information; ___ As a component of the annual or biennial report
RCRA ID	IND005146022	
NAME	DALTON FOUNDRIES INC THE	
LOCATION ADDRESS	1900 E JEFFERSON ST WARSAW IN 46580	___we moved * ___post office change
MAILING ADDRESS	PO BOX 1388 WARSAW IN 46581-1388	1900 E. Jefferson St. Warsaw, IN 46580
CONTACT Title Address	MICHAEL SCHALL MGR ENV ENGR 1900 E JEFFERSON ST WARSAW IN 46580	
Phone Fax E-mail	574-372-1804 Ext	
OWNER Address	DALTON FOUNDRIES INC THE 1900 E JEFFERSON ST WARSAW IN 46580	
phone fax e-mail	574-267-8111 Ext	Did the owner change? ___Yes ___No Date changed: ___/___/___
Land type	P	___private ___municipal ___county ___state ___federal ___district ___Indian ___other
Owner type	P	

* WARNING
If you have moved you may no longer use your old RCRA ID number. IDEM will issue a number for your new location.

Contact for questions on the Annual/Biennial report

Last Name Schall First Name Michael

Title Manager of Environmental Eng. Phone # 574-372-1804

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties under Section 3008 of the Resource Conservation and Recovery Act for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Last Name Schall First name Michael Title Manager of Env. Eng.

Signature Michael Schall Date 5/19/05

IND005146022 DALTON FOUNDRIES INC THE

HAZARDOUS WASTE ACTIVITY	OLQ records	Status in 2004	Status in 2005
GENERATOR *LQG = large quantity* *SQG = small quantity* *CESQG = conditionally exempt*	SQG	___ LQG ✓ Non-handler ___ SQG ___ Out of Business ___ CEG	___ LQG ___ Non-handler * ✓ SQG ___ Out of Business* ___ CEG
TREATMENT, STORAGE, DISPOSAL FACILITY		___ Active TSD ___ Inactive TSD ___ Completed RCRA closure ___ Post closure activities	___ Active TSD ___ Inactive TSD ___ Completed RCRA closure ___ Post closure activities
TRANSPORTER *S = we transport our own waste* *C = we transport waste for others* *X = transporter, status unknown*		___ We transport our own waste (S) ___ We transport for others (C) ___ No longer transport; still in business ___ Out of business	* *If you checked out of business or non-handler, we will deactivate your your ID number. You must reapply for the number before using it again.*

EXEMPT BOILER and/or INDUSTRIAL FURNACE

___ smelting,melting,refining exemption

___ small quantity on site burner exemption

USED OIL *If you are just a generator of used oil this section does not apply to you.*

___ Transporter	___ Processor	___ Marketer who directs shipment to off-specification burner
___ Transfer Facility	___ Re-refiner	___ Marketer who first claims the oil meets specifications
___ Collection Ctr		___ Off-specification Used Oil Burner

TRANSFER FACILITY ACTIVITIES

___ Mix	___ Comingle
___ Bulk	___ Repackage
___ Pump	___ Open containers
___ Combine	___ Transfer between vehicles

UNIVERSAL WASTE Small handler

___ *L = large handler: accumulates > or = 11,000 pounds*

___ *S = small handler: accumulates < 11,000 pounds*

HW CODES *Box I on the Uniform HW Manifest*

___ ___ ___

___ ___ ___

NAICS CODE(S) *A code that describes your type of business*

3321 ___ ___ ___
(primary)

(Go to www.naics.com to find code list)

COMMENTS ___

Return to: Facilities Data Analysis Section, Office of Land Quality
Indiana Department of Environmental Management
100 North Senate Avenue, Room 1101
Indianapolis, Indiana 46204-2241

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

May 3, 2005

VIA CERTIFIED MAIL

7002051000040388479 4

Environmental Coordinator
Dalton Foundries Inc The
PO Box 1388
Warsaw IN 46581-1388

Re: Violation Letter
2004 Annual Manifest Report
Hazardous Waste Program
Dalton Foundries Inc The
IND005146022
Warsaw, Kosciusko County

Dear Environmental Coordinator:

As required by IC 13-22-4-3.1, all Indiana large and small quantity generators must complete and submit the Annual Manifest Report to IDEM by March 1st each year. This letter is to inform you that as of May 3, 2005, our office has not received the 2004 Annual Manifest Report for Dalton Foundries Inc The located at 1900 E Jefferson St .

If your company acted as a large or small quantity generator during **any** one calendar month in 2004, you are required to submit the report. If your company was a conditionally exempt small quantity generator every month in 2004 or if no waste was generated or shipped, no report is required, HOWEVER, the enclosed Hazardous Waste Handler Identification form (ID form) must be returned so that your generator status can be updated in our records. Please indicate clearly on the second page of the ID form what your current generator status was for the year 2004 as well as what your status is or will be in 2005.

In December of 2004, a reporting reminder was sent to generators explaining the reporting requirements and requested the report be submitted. The reports were due on March 1, 2004.

Failure to submit the required information within thirty (30) days of the receipt of this letter will result in a referral to the Office of Enforcement.

The Annual Manifest Report consists of two forms; the ID and OS form (Off-Site Shipment form). The ID form has been enclosed for your convenience. The OS form and

instructions to the ID form and OS form can be obtained from our web site at: www.IN.gov/idem/land/hazwaste/manifest/amr.html. An electronic reporting option is also available on our web site. If you do not have access to the Internet and you need a copy of the report forms and instruction, please contact any of the staff listed below. Please carefully read all reporting instructions before completing the report.

Completed forms must be mailed to (do not fax the forms):

Indiana Department of Environmental Management
Office of Land Quality
Facilities Data Analysis Section
100 N Senate Ave
Indianapolis, IN 46204-2251

If you have any questions, please contact me at (317)233-4624 or via e-mail mweddle@idem.in.gov.

Sincerely,

Michelle Weddle

Michelle Weddle, Environmental Manager
Facilities Data Analysis Section
Office of Land Quality

Enclosure: Hazardous Waste Handler Identification form

(7)

DALTON LANDFILL

Dalton Corporation

September 26, 2008

Via Certified Mail and E-Mail

RECEIVED

SEP 30 2008

DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
OFFICE OF LAND QUALITY

Rosemary Cantwell, Section Chief
Industrial Waste Compliance Section
Indiana Department of Environmental Management
Office of Land Quality
2525 North Shadeland Avenue
Indianapolis, IN 46219

Re: Dalton Corporation, Kendallville Manufacturing Facility
Response to Inspection Summary Letter Dated August 12, 2008

Dear Rosemary:

Dalton Corporation, Kendallville Manufacturing Facility ("Dalton") submits its response, pursuant to Indiana Code §13-14-5-6(a), to the Inspection Summary Letter from IDEM Inspector Mark Espich ("Mr.Espich") dated August 12, 2008 ("the Letter"). Pursuant to Ind. Code §13-14-5-6(b), the department shall review and consider any information presented by Dalton in response to the summary letter, append the information provided to the inspection report and include the written information in the public file.

The Letter is the first inspection report that Dalton received from Mr. Espich since he was assigned to Dalton's facilities in 2008. It is based on the first two inspections of Dalton's facilities conducted by Mr. Espich on March 12th and on June 17th, 2008. This first inspection report also serves as a referral of alleged violations to enforcement prior to any discussion with Dalton or to providing any opportunity for Dalton to take corrective action. Dalton's prior IDEM inspector, Steve Schafer ("Mr. Schafer"), had served as Dalton's inspector since Dalton's Restricted Waste Site ("RWS") began operation and never indicated any major concerns. It would have been beneficial to both IDEM and to Dalton if Dalton had been given some notice regarding the change in standards and policies applicable to its RWS prior to being referred to enforcement. Such a meeting would have given Dalton notice of the new expectations IDEM has of Dalton since the new inspector's standards are clearly different from the prior inspector's.

Warsaw Manufacturing Facility
P.O. Box 1388
Warsaw, IN 46581-1388
(574) 267-8111

Classification

In the Letter, it is alleged that Dalton did not provide accurate information relative to the sample collection for classification of four (4) of its ten (10) waste streams. The four waste streams referred to were all determined to meet a Type II classification and are currently disposed of in Dalton's Warsaw Restricted Waste Site which is a Type II facility. (Kendallville has ten (10) waste streams only four of which currently meet a Type III classification and which are disposed of in Kendallville's RWS). Dalton did provide a Sampling and Analysis plan to IDEM for approval prior to sampling. It was approved and followed. The samples were designed to be representative of each waste stream based on generator knowledge. Dalton is unsure what the allegedly inaccurate information is that is referred to in the Letter and so is not able to substantiate or deny this claim at this time.

Surface Water/Leachate Control

There are several allegations regarding diversion and control of storm water and leachate at the RWS. Currently, storm water may pond on the south and east sides of Phase I. The southern area of Phase I retains water because a clay stockpile is located to the south of this Phase. Besides serving as storage, this stockpile also serves to prevent the storm water from going off site from Phase I to the south. The majority of Phase I has received intermediate cover. Dalton plans to permanently close this section of the landfill and will submit its Notice of Intent to Partially Close to IDEM soon following a survey that is being done to determine elevations.

During the inspection in June, one of the IDEM engineers advised Dalton how to apply intermediate cover on Phase II in order to minimize the working face. Dalton has followed her recommendation and is in the process of applying intermediate cover in the manner in which she recommended. Dalton has also placed a berm over about one-half of the working face in Phase II to prevent storm water from entering the pit in that manner. Storm water does flow to the southeast through Phase II. A ditch has been constructed and lined with rip-rap to direct the water away from the working face. This ditch conveys the storm water from the southern end of Phase II to a low area to the east. The far eastern portion of the property has always had a higher elevation that retains water in that area and prevents the water from discharging off of Dalton's property to the east. These ditches are part of the system approved by IDEM to manage storm water at the site.

Phase II is basically a hole in the ground. This creates a situation where it is very difficult to prevent water from collecting in the bottom of the pit. Dalton does not place waste into the water; however, if it has rained, the waste may be washed down into standing water. Dalton has constructed a clay berm at the bottom of the excavation to separate the storm water that has touched the waste and flowed down the active face of the fill area ("leachate") from the clean storm water that collects on the other side of the berm where no waste has been placed. The leachate was being pumped through a sprinkler system that re-circulates the water back through Phase I. Mr. Espich ordered

Dalton to cease re-circulating the leachate until approval from IDEM is obtained; however, there are no laws or regulations to inform Dalton what procedure to follow or what criteria must be met in order to obtain approval from IDEM to re-circulate the leachate. (This is Type III waste and leachate from Type III waste—not municipal or non-municipal waste and leachate referred to in 329 IAC 10-20-21). The re-circulation is one of the measures that Dalton had undertaken as part of its plan to manage its storm water.

Stormwater Permit

In 2004, Dalton hired August Mack Environmental to review whether it was necessary for Dalton to submit a Notice of Intent for a storm water permit. August Mack advised Dalton that it did not need to do so and Dalton submitted a No Exposure Certification. Neither the previous inspector nor any of the other IDEM representatives that have inspected the site ever indicated to Dalton that a permit was necessary. After the Letter was received that indicated a storm water permit should have been obtained, Dalton began preparing its NOI for its RWS and has hired August Mack to prepare a Storm Water Pollution Prevention Plan. The Letter also indicates that Dalton has discharged pollutants into waters of the United States and violated the Clean Water Act. Dalton is not aware of any discharges into waters of the United States. Clarification regarding the waterway referenced is necessary prior to Dalton responding to this allegation.

Plot Plans and Boundary Markers

Dalton has a blanket purchase order for a surveyor to prepare and update quarterly plot plans. The surveyor, John Kimpel, has provided this service and there are quarterly plot plans. The fence around the property to the north, east and west serves as the approximate RWS property line. There are existing markers that indicate some of the landfill boundaries although they are not easily visible. Dalton has requested Mr. Kimpel to mark the boundaries and will proceed to have more visible boundary markers installed.

Dalton's Kendallville site is in the same position as its Warsaw site. The new inspector has brought a change in interpretation of IDEM's policies and in its standards with no notice to Dalton. Dalton has moved quickly to take corrective action. It has done so at its own risk since it was not stated in the Letter what corrective action IDEM wants Dalton to take. As indicated in this response, there are issues that were raised but not adequately explained to enable Dalton to make a response at this time. In addition, there is confusion regarding how to obtain a permit for approval to re-circulate leachate for a RWS. Dalton wants to comply but IDEM's emphasis has been on enforcement so far and no guidance have been provided on how to comply.

Sincerely,

Lisa McCoy
General Counsel

Cc: Mark Espich

(8)

DALTON

Dalton Corporation

September 8, 2008

Via Certified Mail and E-Mail

Rosemary Cantwell, Section Chief
Industrial Waste Compliance Section
Indiana Department of Environmental Management
Office of Land Quality
2525 North Shadeland Avenue
Indianapolis, IN 46219

LANDFILL

Re: Dalton Corporation, Warsaw Manufacturing Facility
Response to Inspection Summary Letter Dated July 18, 2008

Dear Rosemary:

Dalton Corporation, Warsaw Manufacturing Facility ("Dalton") submits its response, pursuant to Indiana Code §13-14-5-6(a), to the Inspection Summary Letter from IDEM Inspector Mark Espich ("Mr.Espich") dated July 18, 2008 ("the Letter"). Pursuant to Ind. Code §13-14-5-6(b), the department shall review and consider any information presented by Dalton in response to the summary letter, append the information provided to the inspection report and include the written information in the public file.

The Letter is the first inspection report that Dalton received from Mr. Espich since he was assigned to Dalton's facilities in 2008. It is based on the first two inspections of Dalton's facilities conducted by Mr. Espich on March 13th and on June 17th, 2008. This first inspection report also serves as a referral to enforcement. There were no discussions with Dalton regarding the Letter prior to the referral to enforcement. Dalton's prior IDEM inspector was Steve Schafer ("Mr. Schafer") who had served as Dalton's inspector since Dalton's Restricted Waste Site ("RWS") began operation in 1988. Mr. Schafer, and the multi-media inspectors who inspected the plant in the past, have always provided Dalton with a written report and a timeframe for corrective action. Such a procedure gave Dalton the opportunity to ask questions, provide answers and to take the corrective action required prior to any enforcement action. Mr. Espich indicated that he did not have the time to manage such a procedure.

Warsaw Manufacturing Facility
P.O. Box 1388
Warsaw, IN 46581-1388
(574) 267-8111

The opportunity to meet and to discuss the Letter would have been beneficial to both IDEM and to Dalton, during the transition between inspectors. It would have provided IDEM with the opportunity to explain the new inspector's expectations for Dalton's RWS (since they seem to be very different from Dalton's previous inspector's expectations). A meeting would also have given Dalton the opportunity to provide the new inspector with some historical background on Dalton's RWS which is necessary in order to understand the current situation at the RWS.

Dalton's RWS has been subject to several major changes in the past few years that have greatly affected operations at the RWS. These changes include: IDEM's change from a policy that allowed composite testing for waste classification to a regulation that requires that waste must not be combined for testing (329 IAC 10-9-4(m)); IDEM's change from excluding the legitimate use of all slags from permitting requirements to excluding only steelmaking slag pursuant to 329 IAC 10-3-1; and a change in the IDEM policy which was initially to require groundwater monitoring of the deep aquifers at landfills to requiring monitoring of the shallow aquifers. It would have been beneficial to Mr. Espich to have been made aware of these changes and the following effects they have had on the operation of Dalton's RWS prior to referring Dalton to enforcement

For example, Mr. Espich stated in the Letter that he observed uncovered Grinder Dust that is prohibited from disposal (as a Type I waste) at Dalton's RWS. It is unknown how Mr. Espich concluded that the material he observed was Type I grinder dust. No sample of the material was taken. Dalton has several different waste streams that contain baghouse dust and only one of them has previously been classified as Type I. That waste stream is no longer taken to Dalton's RWS for disposal; however, assuming that what Mr. Espich observed was Type I grinder dust, it could have been placed in the RWS during the period of time that composite testing was allowed and that wastestream was classified as Type III. The change in the required methodology for classification from allowing composite testing to requiring each waste stream to be sampled separately caused some waste streams that were once permitted for disposal in Dalton's RWS to no longer be permitted because the classification changed. Therefore, there is no proof that the material observed was Type I grinder dust or, even if it was Type I grinder dust, that it was prohibited from disposal in the RWS as alleged in the Letter.

Another example where historical knowledge would have been helpful to Mr. Espich is the situation regarding the slag pile. Mr. Espich states in the Letter that he observed a slag pile at the RWS that was over height and not covered. In the past, Dalton had provided a contractor with its slag which he used as material for road base and other legitimate purposes. Once the regulation that excluded the legitimate use of slags from permitting was changed to exclude only steelmaking slag from permitting, Dalton had to cease providing its slag to the contractor until it could get the use permitted. Dalton later began storing its iron making slag at the RWS, without cover, because Dalton hoped that its slag could be permitted for beneficial re-use during the current classification process. Since receiving the Letter that expressed concern with having the slag pile uncovered, Dalton

has disposed of the slag in its RWS. Dalton moved quickly in response to IDEM's referral Letter. The slag pile no longer exists.

Mr. Espich also states in the Letter that the facility has not provided roads to the monitoring wells or maintained control of the vegetation around the wells. To Dalton's knowledge, Mr. Espich did not inspect each monitoring well in order to make this determination. There is a road to each of the monitoring wells. The consultants who conduct the sampling at the wells each quarter have never complained regarding lack of access; however, Dalton has not maintained control of the vegetation as Mr. Espich observed. If Dalton had been given the opportunity to meet to discuss the Letter, Dalton could have informed Mr. Espich that IDEM has required Dalton to install a new groundwater monitoring system. The installation of this system began this year as a result of the change in IDEM's policy from requiring monitoring of the deep aquifers to requiring monitoring of the shallow aquifers. At this time, it is unknown where the new wells will be located. Dalton is reluctant to spend its time and resources on maintaining roads that will soon be replaced. Once the location of the new wells is known, new roads will be constructed for access to the new monitoring wells.

Besides the above historical changes affecting the RWS, there are also historical permitting issues of which Mr. Espich apparently is not aware. Mr. Espich states in the Letter that the facility was not operating its collection sump installed in the northeast corner of Phase 3, Section 1 to control the leachate as required in its permit. Prior to Dalton constructing Section 1 of Phase 3 there were discussions between IDEM and Dalton to address concerns that both entities had with regard to water collecting in the NE corner of that section of the RWS. The decision was made to install a sump that was designed to address the leachate in the waste that would eventually be built up and surround the sump. It was not designed to address the current situation where the precipitation falls on to the working face and then ponds over to the NE corner where no waste has been deposited. According to 329 IAC 10-28-10, Type II restricted waste sites must not deposit solid waste in standing or ponded water except for that water resulting from precipitation directly upon the working face. Dalton has not deposited solid waste in the standing water in the NE corner. Therefore, the fact that Dalton is not currently operating the sump is not a permit violation because it was not designed and built to address the current situation. As discussed below, Dalton has taken measures to address the standing water in the NE corner and the erosion caused by water in that area.

Mr. Espich states in the Letter that Dalton has not implemented any erosion and sediment control measures but he also discusses Dalton's sediment control structures. Sediment control structures <u>are</u> sediment control measures. He also states that because of Dalton's failure to implement the required erosion and sediment controls, Dalton is now required to apply daily cover rather than the annual cover currently required in its permit. In the NE corner of Section 1 of Phase 3 Dalton had constructed a check dam using rip rap. The check dam was designed to slow the storm water flow to the NE corner and to drop out any sediment that had accumulated. It worked until this spring when extremely

heavy rains, which continued on into early summer, washed up and over the sides of the check dam causing one side to erode.

After receipt of the Letter, Dalton repaired the check dam in Phase 3, Section 1 and constructed three additional dams so that if the flowing water manages to get past one dam, the flow will be slowed by one of the subsequent dams. The erosion that occurred this spring and early summer was worse than in most years. Northern Indiana had several torrential rainfall events where a lot of rain fell in a very short period of time. (The fact that the erosion occurred in 2008 is supported by the fact that Mr. Schafer's written quarterly inspection reports from 2007 never mention erosion as a problem). The damage caused by the erosion was repaired as soon as the weather allowed and equipment was available. In fact, most of the erosion damage has now been repaired. In addition, in the area where the erosion was the worst-- in the NE corner-- Dalton has repaired the intermediate cover so that the water will be redirected to a newly constructed swale-like area lined with rip rap that will help to prevent any further erosion in the future. Mr. Espich's contention that Dalton is now required to apply daily cover is not valid. Dalton will continue to apply intermediate cover as required pursuant to its permit until directed differently.

Mr. Espich also contends in the Letter that Dalton did not provide the annual intermediate cover over areas where it should have been placed. He states that only ten (10) acres at the RWS have received intermediate cover. This is not accurate. Dalton estimates that when Mr. Espich conducted his inspections in March and June there were at least twice as many acres that had received intermediate cover. The areas receiving intermediate cover included all areas on the outer boundaries of those portions of the RWS that had received waste (except for the working phase). This was placed in order to help prevent any offsite migration. Since receipt of Mr. Espich's letter, intermediate cover has been placed on all filled portions of the RWS except for the current working face of the active fill area. In addition, as indicated in the Letter, Dalton has not final closed any of the areas of the RWS. Dalton has chosen not to close portions that it plans to expand. Dalton has the right to request a vertical expansion, which it plans to do in the near future, and placing two feet of clay and six inches of topsoil on an area that may be vertically expanded is a waste of natural resources, money and time. In any case, Dalton has submitted a Closure Notice to IDEM indicating its intent to close some portions of the RWS where a vertical expansion has not been planned. In the near future, Dalton will also submit a major modification application requesting to expand the RWS.

Mr. Espich notes in the Letter that Dalton had submitted a No Exposure Certification to IDEM in 2004 that indicated that there were no outfalls leaving the property. Mr. Espich states that the letter is inaccurate given that leachate from Phase 3, Section 1 is discharged through a drainage ditch into Boggs Ditch and contaminated runoff from Phase 1 discharges through a pipe under State Road 25. He also contends that surface water and waste were observed leaving the property to the south along an on-site road. Dalton did hire August Mack in 2004 to review the storm water situation at the RWS. August Mack advised Dalton that a No Exposure Letter was applicable. In 2004, Phase

III, Section 1 had not yet been built and there was no storm water issues involved with industrial waste in the NE corner of that section at that time. Although Mr. Espich also contends that leachate from Section 1 is now discharged through a drainage ditch after this check dam and then into Boggs ditch, Dalton is not aware of a drainage ditch that flows from this section all the way to Boggs ditch and Dalton has never seen any contaminated water from this area leaving the property. Mr. Espich's photographs taken during his inspection also fail to document any such discharge from this area.

There also was no drainage ditch in 2004 leading off site to the north of Phase I. In 2005, Phase III Section 1 was constructed and began operation in that Section in 2006. This construction changed the contouring of the landfill and caused water to flow in a northwesterly direction off of Phase I. Dalton constructed a check dam in 2007 and a retention basin to slow the flow from that area of the site prior to any discharge. The storm water flow has created a conveyance that eventually flows off site. Mr. Espich states that during his inspection, this "channel" was black all the way to the discharge point at State Road 25. What he fails to mention is that the water is conveyed through an actively farmed field and unless Mr. Espich took samples, there is no way to determine whether this black material observed was runoff from Dalton's RWS, runoff from the field or simply sediment gathered as the water is conveyed and cuts its way directly through the farm field. Dalton is also unaware of the area to the south where Mr. Espich claims that water and waste were observed leaving the property. Dalton owns property beyond the boundary of the site and if waste is seen leaving the site it does not necessarily indicate that it is discharged off of Dalton's property. Dalton did fail to update its No Exposure certification. A Notice of Intent ("NOI") letter should have been submitted in order to obtain a general storm water permit once the check dam had been constructed. Since receipt of the Letter, Dalton has submitted an NOI form to IDEM and it has hired August Mack to prepare a storm water pollution prevention plan for the RWS. The failure to submit an NOI was an oversight on Dalton's part. It also was never mentioned by the previous inspector or by any other IDEM representatives until this Letter.

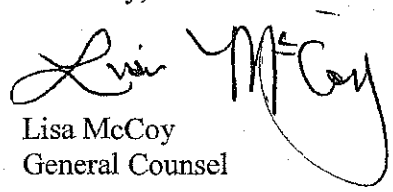
Mr. Espich further states in the Letter that the facility is unable to provide quality assurance for the sampling data submitted for its most recent waste classification. Whether Mr. Espich is referring to the current waste classification that occurred over two years ago or the pending waste classification, Dalton has always submitted sampling and analysis plans ("SAP") to IDEM for its approval prior to sampling. It has provided IDEM with the QA/QC that it stated it would provide in its SAP. In addition, representatives from IDEM who are involved in the waste classification process at IDEM have inspected Dalton's facility's processes and it's RWS on several occasions. Dalton's SAPs have always been approved and Dalton has always followed them. Mr. Espich is now raising issues concerning the SAPs that have not been raised before. Dalton recently finished sampling for its pending waste characterization and classification in July so Dalton expects that any issues raised by Mr. Espich's concerns will not be applied retroactively

to Dalton's detriment. Again, this is an issue where discussion would be a benefit to both parties.

Finally, Mr. Espich contends that Dalton did not maintain updated quarterly plot plans. Dalton does maintain updated quarterly plot plans. Dalton has a registered surveyor, John Kimpel, who is under a blanket purchase order to update the plot plans on a quarterly basis and he has done so.

In sum, Dalton believes that there is a lack of communication between IDEM and Dalton. Dalton's RWS has already been subjected to major policy and regulatory changes that have greatly affected Dalton's investment in its RWS. It would have been much more productive for IDEM and Dalton to sit down and discuss the issues prior to any referral to enforcement at least during this transitional time. This administration has stated that its focus is on compliance and not on enforcement. Dalton is more than willing to comply but in this case, IDEM's policies, interpretations and standards have apparently changed in midstream. Dalton has already taken major steps in an attempt to address most of the issues of concern raised in the Letter. Dalton is willing to take additional action if IDEM will help us to understand what Dalton needs to do in order to meet the current compliance standards, if they have not already been met based on Dalton's quick reaction to the Letter. If IDEM prefers to pursue enforcement action, then Dalton is also more than willing to litigate the issues raised herein.

Sincerely,



Lisa McCoy
General Counsel

Cc: Mark Espich
Nancy Johnston

(9)

DALTON

Dalton Corporation

August 11, 2008

Via E-Mail and Certified Mail

Rosemary Cantwell, Section Chief
Industrial Waste Compliance Section
Indiana Department of Environmental Management
Office of Land Quality
2525 North Shadeland Avenue
Indianapolis, IN 46219

Re: Notice of Intent to Respond

Dear Rosemary: LANDFILL

On July 23, 2008 Dalton Corporation, Warsaw Manufacturing Facility ("Dalton") received an Inspection Summary Letter dated July 18, 2008. The letter was a summary of observations made by representatives of IDEM's Office of Land Quality during inspections conducted on March 13, 2008 and on June 17, 2008. In accordance with Indiana Code §13-14-5-6(a), Dalton is entitled to provide information in response to this written summary. Pursuant to Ind. Code§13-14-5-6(b) the department shall then review and consider any information presented, append the information provided to the inspection report and include the written information in the public file.

According to Ind. Code §13-14-5-2(2), IDEM has forty-five calendar days following an inspection to provide the written summary of the inspection to Dalton. Therefore, Dalton will provide the response to the summary letter to IDEM within forty-five days of receipt of the letter which is September 8, 2008.

Warsaw Manufacturing Facility
P.O. Box 1388
Warsaw, IN 46581-1388
(574) 267-8111

Dalton also requests color copies of the photographs that were attached to the summary letter. They can be e-mailed to my e-mail address below or sent by post-mail. If you have any questions, do not hesitate to call me at (574) 268-3207 or to e-mail me at lmccoy@daltonfoundries.com.

Sincerely,

Lisa McCoy
General Counsel

CC: Nancy Johnston
Office of Enforcement

CANTWELL, ROSEMARY

From: CANTWELL, ROSEMARY
Sent: Thursday, August 21, 2008 5:36 PM
To: 'McCoy, Lisa'
Subject: FW: Dalton Warsaw
Attachments: Dalton Warsaw RWS 3-13-2008 pht.doc; Dalton Warsaw RWS 6-17-2008 pht.doc

Hi Lisa,
Attached are color photos taken by IDEM during inspections conducted on 3-13-08 and 6-17-08 at the Dalton Warsaw Facility. These are the photos that you requested in a letter to me dated August 11, 2008 and received by IDEM on August 20, 2008.

If you have any trouble opening the files let me know.

Thanks,
Rosemary

(12)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

VIA CERTIFIED MAIL 7002 0510 0004 0411 0991

June 16, 2005

Mr. Michael Schall
Dalton Corporation/Warsaw
1900 East Jefferson
Warsaw, Indiana 46580

Re: Violation Letter
Dalton Corporation/Warsaw
IND 005 146 022
Warsaw, Kosciusko County

Dear Mr. Schall:

On 2/11/05, a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Dalton Corporation, located at 1900 East Jefferson, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection:
_X__ Compliance Evaluation Inspection (Industrial Waste)
_X__ Complaint
___ Other _____

Results of Inspection:
___ Violations were observed but corrected during the inspection. See inspection report.
_X__ Violations were observed. See inspection report.

Within (30) days of receipt of this letter, a written detailed explanation, documenting compliance with each of the requirements listed in the inspection report, must be submitted to this office. Please direct any response to this letter and any questions to Theresa Pichtel at (317) 308-3050.

Sincerely,

Rosemary Cantwell

Rosemary Cantwell
Section Chief
Industrial Waste Compliance Section
Compliance and Response Branch

Enclosure
cc: Koscuisko County Health Department

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mail piece, or on the front if space permits.

1. Article Addressed to:

66-20-2 TMP/mlewis
Mr. Michael Schall
Dalton Corporation/Warsaw
1900 East Jefferson
Warsaw, Indiana 46580

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) [illegible] C. Date of Delivery [illegible]

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7002 0510 0004 0411 0991

PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

(13)

IDEM

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(800) 451-6027
www.IN.gov/idem

March 2, 2005

Mr. Michael Schall
Dalton Foundry
P.O. Box 271
Kendallville, IN 46581-1388

WASTE CLASSIFICATION FOR LANDFILL

Re: Sampling and Analysis Plan
Waste Classification Renewal
Dalton Foundry
Kendallville, Noble County
Warsaw, Kosciusko County

Dear Mr. Schall:

This letter is a follow-up to a phone conversation between Mr. Eric Emmit from August Mack Environmental and myself on February 10, 2005 regarding the waste classification renewal process for Dalton Foundry at both the Kendallville and Warsaw facility.

As discussed, the new waste classification sampling and analysis plans for both sites need to describe separate sampling and analysis for all the individual wastes disposed within the landfill. Analysis used to obtain the individual hazardous waste determinations may by used for the waste classification TCLP constituents found in Table 1 of 329 IAC 10-9-4 (b)(2)(A) as long as the support documentation includes Level III quality assurance quality control information.

In addition, other information that may be submitted to the IDEM to obtain a waste classification for the individual wastes could include, but may not be limited to the following: recent analytical information obtained using test procedures outlined in 329 IAC 10-9-4, historical analytical data about the individual waste, and detailed knowledge of the processes and raw materials generating the waste that may demonstrate similarities to other wastes generated by the facility.

Because Dalton's previous waste classifications expired April 30, 2003 (Kendallville), and July 31, 2003 (Warsaw), IDEM requests that a sampling and analysis plan be submitted within 30 days. The plan may include a specific timetable, no greater than six months, in which this plan would be carried out.

If you have any questions please call me at 317/308-3003, or Mr. George Ritchotte at 317/308-3123.

Sincerely,

Rosemary Cantwell

Rosemary Cantwell
Industrial Waste Compliance
Compliance and Response Branch

cc: Mr. Eric Emmit, August Mack Environmental
Mr. John Hale, Solid Waste Permits

(16)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

Northern Regional Office
220 West Colfax Ave., Suite 200
South Bend, Indiana 46601-1634
(574) 245-4870
Toll Free (800) 753-5519
Fax (574) 245-4877
www.idem.IN.gov

VIA CERTIFIED MAIL 7002 0510 0004 2616 2121 July 18, 2008

Mr. Michael Schall
Dalton Corporation Warsaw
1900 East Jefferson Street
Warsaw, Indiana 46851

Re: Inspection Summary Letter
Dalton Corporation Warsaw
Restricted Waste Site
Warsaw, Kosciusko County

LANDFILL

Dear Mr. Schall:

On March 13, 2008, and June 17, 2008, representatives of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Dalton Corporation Restricted Waste Site, located at CR 250 South and SR-25 in Kosciusko County. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection:
- X Compliance Evaluation Inspection
- ___ Complaint
- X Other: Restricted Waste Site Inspection

Results of Inspection:
- ___ No violations were observed
- ___ Additional information and review is required to evaluate overall compliance.
- X Violations were observed and will be referred to the Office of Enforcement. See inspection report.

Please direct any response to this letter and any questions to me at 574/245-4872.

Sincerely,

Mark Espich

Mark Espich
Environmental Manager
Industrial Waste Compliance Section
Compliance and Response Branch

Enclosure
cc: Kosciusko County Health Department

RESTRICTED WASTE SITE
TYPE I or II
INSPECTION REPORT
State Form
Indiana Department of Environmental Management

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Industrial Waste Compliance Section
Office of Land Quality
100 N. Senate Ave.
Mail Code 65-45
Indianapolis, IN 46204-2251

Facility Name: Dalton Corporation Warsaw		
EPA Identification Number: IND005146022		
Location: County Road 250 South and State Road 25		
City: Warsaw	**County:** Kosciusko	**Zip Code:** 46580
Inspector: Mark Espich	**Inspection Date:** March 13, 2008 and June 17, 2008	
Other IDEM Representatives: Rosemary Cantwell, Daniela Klesmith, John Hale, Alan Minne		
Primary contact during inspection: Michael Schall		

A. Pre-Inspection File Review

On-Site Disposal Notification Date:

Restricted Waste Site Facility Type/Issuance Date:

Restricted Waste Site Permit Reviewed by Inspector: Date: June 16, 2007

Wastestream(s) permitted for disposal generated by facility:

Wastestream(s) Classified	Classification Number	Expiration Date(s):
Excess Sand	WC 06-005 – Type II	June 15, 2008
Slag	WC 06-006 – Type II	June 15, 2008
Yard Cleanup	WC 06-007 – Type II	June 15, 2008
Shot Blast and Grinder Dust	WC 06-011 – Type II	June 15, 2008
Molding Exhaust Fines	WC 06-012 – Type II	June 15, 2008
Shot Blast Separator Waste	WC 06-013 – Type II	June 15, 2008
Grinder Dust Collector	WC 06-014 – Type I	June 15, 2008
Filter Press	WC 06-015 – Type II	June 15, 2008
Refractory	WC 06-016 – Type II	June 15, 2008
Dirt from Charge Yard	WC 06-017 – Type II	June 15, 2008
Core Sand	WC 06-018 – Type II	June 15, 2008

Other wastestream(s) approved for disposal (such as those generated by other facilities):

Dalton Corporation Kendallville manufacturing facility all Type II, Type III, and Type IV foundry wastes.

Treated wastestream(s) {hazardous or non-hazardous}:

None.

Previous Inspections:

March 13, 2008

Unresolved violations/comments:

On April 24, 2008, an insignificant modification of the January 25, 2008, permit renewal was granted for a one-time extension of the deadline for renewing the current waste classifications. The current waste classifications expired June 15, 2008, and the renewal is due on July 14, 2008.

B. Restricted Waste Site Inspection Comments

The restricted waste site is permitted as a Type II landfill for the disposal of wastes generated by Dalton's foundry operations. The total acreage of the facility is 156 acres with 68.4 acres permitted as a Type II landfill. The facility is currently filling in all three Phases and has not minimized the working face of the landfill. Intermediate cover has only been applied to the western edge of Phase 1 and the southern edge of Phase 2. There are many areas that have not received waste within one year and have not received intermediate cover. Currently there are approximately 48 acres active at the landfill with less than 10 acres receiving intermediate cover. The facility did not maintain an updated quarterly plot plan detailing the current status of the landfill operations so it was difficult to determine the extent of the landfilling. In the areas that did receive intermediate cover, erosion, ponding water, trees, and exposed waste were observed.

A variance was granted to the facility allowing annual cover in all three phases of the landfill provided that they implement sedimentation/erosion control measures to minimize erosion and to maintain sedimentation control structures and drainage ditches. The facility has not implemented any erosion and sediment control measures to minimize sediment and waste from leaving the active portions of the site and they do not inspect the sediment control structures. There were numerous areas throughout the landfill that had severe erosion problems, some extending down through the cover and into the waste. On the north side of Phase 2 an erosion cut was observed that had gone completely through the waste and into the clay liner, approximately 12 feet deep. Runoff from this area was deposited in the wetlands north of the fill area. Sediment, waste, and leachate were observed leaving the active fill area through two drainage ditches. Runoff from Phase 3, Section 1 has caused severe erosion of the drainage ditch bank at the check dam. This ditch discharges into Boggs Ditch and a wetland to the north. The facility was required to install a leachate collection sump to collect the leachate from the active fill area of Phase 3 for proper disposal. The system was installed, but the facility was not operating it and allowed leachate to discharge to waters of the United States. Another drainage ditch receiving runoff from Phase 1 discharges to a culvert that runs under State Road 25 and then into a pond located outside the facility boundary. The drainage ditch was filled with foundry waste at the check dam and the runoff was flowing around the structure. The channel of the drainage ditch was black all the way to the discharge point at State Road 25. The facility is out of compliance with the permit requirements for the variance and is required to apply daily cover until a dispersal control plan is approved by the commissioner. On June 24, 2004, the facility submitted a letter to the IDEM regarding a "No Exposure Certification". The letter claims that the site is exposed to industrial activities during unloading of fill material and that stormwater enters Boggs Ditch via sheet flow. The letter also stated that there are no other outfalls leaving the property. The information provided by the facility in the June 24, 2004, letter is inaccurate given the fact that more than 38 acres of the landfill is exposed, leachate enters Boggs Ditch through a drainage ditch and not via sheet flow, and there are outfalls leaving the property. The facility has not complied with the requirements regarding stormwater discharges and has allowed unpermitted discharges of leachate and stormwater to waters of the United States.

C. Restricted Waste Site Inspection Summary

C.1 **Violations. The checklist below is not comprehensive, but includes the most common violations. Checked violations and additional violations are described in detail in Section C.2 and include location information, corrective measures, and compliance dates. Appropriate documentation, photographs and maps may also be attached. When appropriate, a representative portion of a facility or documents may be inspected. A description of those portions inspected is provided in Section B, Restricted Waste Site Inspection Comments.**

1) Permit Compliance 329 IAC 10-13-4(c)	X	17) First Aid Kit 329 IAC 10-28-7(b)		33) Establish & Maintain Vegetation 329 IAC 10-28-14(b)	
2) Established Roadways 329 IAC 10-28-1(a)		18) Communications System 329 IAC 10-28-7(c)		34) Proper Grading 329 IAC 10-28-14(c)	X
3) Restricted Access 329 IAC 10-28-1(b)		19) On-Site/Up to Date Plans 329 IAC 10-28-8(a)		35) Vegetation Clearing 329 IAC 10-28-14(d)	X
4) Passable Roads 329 IAC 10-28-2(a)	X	20) Quarterly Plot Plans 329 IAC 10-28-8(b)	X	36) Surface Leachate Management 329 IAC 10-28-15(a)	X
5) Tracking Mud 329 IAC 10-28-2(b)		21) Furnishing Records to IDEM 329 IAC 10-28-8(c)		37) Leachate 50ft Beyond SW Boundary 329 IAC 10-28-15(b)	X
6) Monitoring Well Access 329 IAC 10-28-2(c)	X	22) Open Burning 329 IAC 10-28-9		38) Leachate Disposal 329 IAC 10-28-16	X
7) Signs 329 IAC 10-28-3		23) Waste Deposited in Water 329 IAC 10-28-10(a)	X	39) Groundwater Monitoring Wells 329 IAC 10-28-17	
8) Livestock Present 329 IAC 10-28-4(a)		24) Cover Soil Type 329 IAC 10-28-11(a)	X	40) Explosive Gases 329 IAC 10-28-19	
9) Vector, Dust, Odor 329 IAC 10-28-4(b)		25) Cover Maintenance/ Alt. Cover Approval 329 IAC 10-28-11(b)	X	41) Leachate Collection 329 IAC 10-28-20	X
10) Litter 329 IAC 10-28-4(c)		26) Working Face Size (RWS I Only) 329 IAC 10-28-12(a)(1)		42) Closure Performance Standards 329 IAC 10-30-1	
11) Dead Animal Disposal 329 IAC 10-28-4(d)		27) Cover Application & Compaction (RWS I Only) 329 IAC 10-28-12(a)(2)		43) Final Cover (RWS I Only) 329 IAC 10-30-2(a)	
12) Outside Containers 329 IAC 10-28-4(e)		28) Intermediate Cover (RWS I Only) 329 IAC 10-28-12(a)(3)		44) Top Soil (RWS I Only 329 IAC 10-30-2(b)	
13) Scavenging 329 IAC 10-28-5		29) Cover Application & Compaction (RWS II Only) 329 IAC 10-28-12(b)	X	45) Final Cover (RWS II Only) 329 IAC 10-30-3(a)	
14) Salvage Operations 329 IAC 10-28-6(a)		30) Fugitive Dust 329 IAC 10-28-13(a)	X	46) Top Soil (RWS II Only) 329 IAC 10-30-3(b)	
15) Salvage Storage 329 IAC 10-28-6(b)	X	31) Daily Cover/Control Plan 329 IAC 10-28-13(b)	X	47) Other	X
16) Safety Devices 329 IAC 10-28-7(a)		32) Cover Continuous Maintenance 329 IAC 10-28-14(a)	X		

II. **Violation descriptions: Includes observed violations with corresponding regulatory citations and permit conditions (when applicable), corrective measures and compliance dates.**

329 IAC 10-4-2 and 329 IAC 10-4-3

No person shall cause or allow the storage, containment, processing, or disposal of solid waste in a manner which creates a threat to human health or the environment, including the creating of a fire hazard, vector attraction, air or water pollution, or other contamination.

The facility allowed the open dumping of waste tires and plastic pipes in a low area west of the access road in Phase 1. These tires were observed during the March 13, 2008, inspection and again on June 17, 2008. A corroded 55-gallon container of unknown material and a plastic storage container were also observed in the disposal area of Phase 3.

Approval of Renewal of Solid Waste Permit dated 1-25-2008 – Requirement D5

The permittee must control public access to the facility and prevent unauthorized vehicular traffic and illegal dumping of wastes.

Several pieces of furniture were observed inside the facility boundary along the north side of the road near the site entrance. The furniture was observed during the March 13, 2008, inspection and again on June 17, 2008.

329 IAC 10-9-4

A restricted waste site must accept only the restricted waste types determined according to the classification criteria in 329 IAC 10-9-4. Waste analyses submitted to the commissioner for review must be accompanied by sufficient documentation of representative sampling and quality assurance and quality control measures to establish that the applicable procedures were conducted under adequate controls.

The facility was unable to provide quality assurance for the sampling data submitted for their most recent waste classifications. Information on the sample locations or units from where the samples were collected was not available or documented by the facility. Waste classification WC 06-011 is identified as Shot Blast and Grinder Dust (Type II). The Grinder Dust (WC 06-014) by itself is a Type I waste and is not permitted for disposal at the Dalton restricted waste site. Shot Blast and Grinder Dust (WC 06-011) is accumulated in baghouse #6, baghouse #12, and baghouse #16. The amount of grinding dust received by each of these baghouses varies considerably and the facility does not know from what unit the samples were collected. The facility also generates Yard Cleanup (WC 06-007) from dredging and dewatering activities in the yard. The facility representative indicated that Yard Cleanup is runoff comprised of various uncontainerized foundry wastes removed from the ditch in the yard and placed on a pile of Excess Sand (WC 06-005) for dewatering. During the inspection, the pile of sand for dewatering contained Core Sand (WC 06-018) and not excess sand. The information submitted for the Yard Cleanup waste classification approval is not consistent with the current operations and contains a variety of wastes from poor housekeeping practices that can change daily. Further, uncovered Grinder Dust that is prohibited from disposal in the landfill was observed in Phase 1.

329 IAC 10-28-2 and Approval of Renewal of Solid Waste Permit, dated 1-25-2008 – Requirements E3 and E4

On-site roads that provide access to disposal areas must be passable to vehicles utilizing these areas. The owner or operator of a restricted waste site Type I or Type II or nonmunicipal solid waste landfill shall construct and maintain on-site roads in such a way as to minimize the tracking of mud or soil material from the facility onto public highways or provide and maintain equipment to remove any such mud or soil material that is tracked onto the public highways. Access to monitoring wells for vehicles driven by department representatives must be provided. Vegetation must be controlled on the access way and around the wells.

The facility has not provided access roads to the monitoring wells and has not maintained control of the vegetation around the monitoring wells.

Approval of Renewal of Solid Waste Permit, dated 1-25-2008 – Requirement D3
Permanent, visible boundary markers which delineate the approved facility and waste boundaries shall be maintained for the life of the facility.

The facility did not maintain visible boundary markers delineating the approved facility and waste boundaries.

329 IAC 10-28-6
Salvaging on-site at a restricted waste site Type I or Type II or nonmunicipal solid waste landfill must be done only under the supervision of the owner or operator and must not interfere with the facility operations. Salvaged materials must be stored in buildings or transportable containers while awaiting removal from the facility. Alternative methods of storing salvaged materials must have prior approval from the commissioner. Approval may be granted at the request of the owner or operator if the owner or operator can demonstrate that the alternative method will provide a comparable level of environmental protection.

The facility was conducting a salvaging operation for scrap metal at the site and the salvaged material was deposited on the ground.

329 IAC 10-28-8
Restricted waste sites Type I and Type II and nonmunicipal solid waste landfills must maintain on-site an up-to-date copy of the plans and specifications approved by the commissioner in granting the permit. Restricted waste sites Type I and Type II and nonmunicipal solid waste landfills must maintain on-site a plot plan of the solid waste land disposal facility. The plot plan must be updated quarterly. The plot plan must describe the following:
(1) Areas of excavation.
(2) Areas of current filling.
(3) Areas under intermediate cover.
(4) Filled areas lacking final cover.
(5) Finished areas with final cover contoured and seeded.

The facility did not maintain an updated quarterly plan detailing the required information listed above.

329 IAC 10-28-10, Approval of Renewal of Solid Waste Permit, dated 1-25-2008 – Requirement D6, and Approval of Minor Modification to Solid Waste Permit, dated 12-2-2005 - Requirement 3
Restricted waste sites Type I and Type II landfills must not deposit solid waste in standing or ponded water except for that water resulting from precipitation directly upon the working face. Surface water must be diverted from the active fill area to minimize surface water contact with the waste and interference with the daily operation.

The facility did not divert surface water from the active fill area and did not minimize surface water contact with the waste. Surface water was ponded in the bottom of the fill area in Section 1 of Phase 3. Visual evidence of erosion cuts indicated that surface water was washing out buried waste from the top of the fill area and depositing it into the bottom of the open cell. Incoming waste was also being deposited into Section 1 of Phase 3 from the top of the slope where it then fell into the pond of surface water leachate. A minor modification to the solid waste permit, dated December 2, 2005, required the permittee to install a leachate collection sump to divert leachate from the base of the fill area. The sump has been installed, but it is not being utilized for leachate collection.

329 IAC 10-28-11, 329 IAC 10-30-3, and Approval of Renewal of Solid Waste Permit dated 1-25-2008 – Requirement D9a

Cover for restricted waste sites Type I and Type II and nonmunicipal solid waste landfills must be soil of Unified Soil Classification ML, CL, MH, CH, or OH, or other suitable material approved by the commissioner to provide an adequate level of environmental protection. Cover must be applied and maintained at restricted waste sites Type I and Type II and nonmunicipal solid waste landfills in accordance with the applicable requirements of this rule and 329 IAC 10-30-3. Other provisions for cover may be approved by the commissioner if it can be demonstrated that an alternate cover or site design will provide an adequate level of environmental protection.

The intermediate yearly cover variance granted for use in all three phases of landfilling requires that the permittee shall minimize the working face of the landfill. All areas of the landfill filled to the approved elevations shall comply with 329 IAC 10-30-3. All other areas that have not received additional waste within one (1) year of the time of the filling shall be covered with six (6) inches of intermediate cover material. Intermediate cover material may be composed of soil as defined in 329 IAC 10-28-11, or foundry sand classified as restricted waste Type IV under 329 IAC 10-9.

The facility has not minimized the working face of the landfill and is filling in all three Phases. There were many areas that had not received waste within one year and had not received intermediate cover. The facility has only applied intermediate cover to the western edge of Phase 1 and the southern edge of Phase 2; erosion was observed in both of these areas. Between Phase 2 and Phase 3 there was a large slag pile that had exceeded the height limit and final cover had not been applied.

Approval of Renewal of Solid Waste Permit dated 1-25-2008 – Requirement D9b

The intermediate yearly cover variance granted for use in all three phases of landfilling requires the following: For any area of the landfill having intermediate cover, additional erosion and sediment control measures must be implemented within fifteen (15) days after placement of the intermediate cover. The erosion/sedimentation control measures may include, but are not limited to the establishment of vegetation, use of alternative/synthetic covers or liners, and/or use of other applicable erosion/sedimentation control measures.

The facility has not implemented any erosion and sediment control measures to minimize sediment and waste from leaving the active portions of the site. There were numerous areas throughout the landfill that had severe erosion problems; some extending down through the cover and into the waste. On the north side of Phase 2 an erosion cut was observed that had gone completely through the waste and into the clay liner; approximately 12 feet deep. Sediment, waste, and leachate were observed leaving the active fill area through two drainage ditches. Runoff from Phase 3, Section 1 has caused severe erosion of the drainage ditch bank at the check dam. This ditch discharges into Boggs Ditch and a wetland to the north. Another drainage ditch receiving runoff from Phase 1 discharges to a culvert that runs under State Road 25 and then into a pond located outside the facility boundary. The drainage ditch was filled with foundry waste at the check dam and the runoff was flowing around the structure. The channel of the drainage ditch was black all the way to the discharge point at State Road 25. Further, the facility does not conduct inspections or perform preventative maintenance on the drainage ditches, check dams, or other sedimentation/erosion control devices.

329 IAC 10-28-13, Approval of Renewal of Solid Waste Permit dated 1-25-2008 – Requirement D9c and D13

Notwithstanding the cover requirements of this rule and 329 IAC 10-30-3 for restricted waste site Type II, if the facility operation is found to be in violation of fugitive dust regulations of the air pollution control board or if the commissioner documents evidence of visible waste deposits carried by wind or surface water beyond the site property boundary, restricted waste site Type II must complete the following:

(1) Apply daily cover.

(2) Submit a plan to control dispersal.

Application of daily cover must continue until a dispersal control plan is approved by the commissioner.

The facility shall take appropriate measures to minimize fugitive dust and sediment and erosion at the facility. An unacceptable inspection report by IDEM documenting that fugitive dust, uncontrolled sediment, or erosion are creating a nuisance or threat to human health and the environment, may lead to the revocation of the intermediate yearly cover variance.

The facility allowed waste to be deposited beyond the site property boundary by surface water runoff. Foundry waste was observed leaving the site at the State Road 25 discharge point.

329 IAC 10-28-14

Cover material applied as required in sections 11 through 13 of this rule and 329 IAC 10-30-3 must be continuously maintained, including application and compaction of additional cover as needed to maintain required depth. Restricted waste sites Type I and Type II and nonmunicipal solid waste landfills must be graded to promote surface water drainage and to prevent the ponding of water on previously filled areas. Vegetation must be cleared only as necessary.

The facility did not maintain the covered portions of the landfill and did not properly grade the filled areas to promote surface water drainage. Erosion was observed in the intermediate cover on the western edge of Phase 1 and the southern edge of Phase 2. Exposed waste, ponding water, and large trees, were also observed on the southern edge of Phase 2.

329 IAC 10-28-15

Any leachate on the surface of restricted waste sites Type I and Type II and nonmunicipal solid waste landfills must be immediately managed or controlled to prevent off-site migration. Any surface movement of leachate past a point fifty (50) feet outside of the solid waste boundary is prohibited except as specified in the facility permit.

The facility did not properly control or manage the leachate to prevent off-site migration. The leachate collection sump installed in the northeast corner of Phase 3, Section 1 was not being utilized to control the leachate. The leachate was allowed to migrate past the solid waste boundary and discharge into Boggs ditch and the wetland area to the north.

Leachate Disposal and Collection:

329 IAC 10-28-16, Approval of Renewal of Solid Waste Permit dated 1-25-2008 – Requirement D7

Any discharge or disposal of collected leachate must be in accordance with applicable local, state, and federal laws and rules. The permittee shall manage surface water as described in the application. The drainage ditches and sedimentation basins shall be properly maintained to prevent sedimentation from deposition off-site. Temporary run-off control structures shall be constructed in areas which are unable to drain to the sedimentation basins.

329 IAC 10-28-20 Approval of Minor Modification to Solid Waste Permit dated 12-2-2005 – Requirement 3

Leachate collection systems must be operated in such a manner as to comply with the design standards and plans specified in 329 IAC 10-26-1(b). The permittee shall install a leachate collection sump in the northeast corner of Section 1 of Phase 3. The location is depicted on plan sheet Figure 3 titled "Proposed Base Grade Elevation for Section 1 of Phase III, Alternate Site Monofill (Revised)," dated September 23, 2005. The permittee shall remove and properly dispose of leachate from the sump whenever a pumpable volume of leachate exists in the sump.

The facility allowed the discharge of leachate from Section 1 of the landfill to the drainage ditch. A leachate collection system has been installed, but the facility is not operating the system or removing the leachate from the landfill.

Approval of Renewal of Solid Waste Permit dated 1-25-2008

Permit Requirement D11 – The permittee shall not cause a discharge of pollutants into waters of the United States, including wetlands, that violates the Clean Water Act, including, but not limited to, the requirements of the National Pollution Discharge Elimination System (NPDES).

Permit Requirement D12 – The permittee shall not cause the discharge of a nonpoint source of pollution into the waters of the United States, including wetlands, that violates any requirement of an area-wide or statewide water quality management plan that has been approved under Section 208 or 319 of the Clean Water Act, as amended. The permittee shall comply with applicable requirements of 327 IAC 15 regarding stormwater discharges.

The facility caused and allowed the discharge of pollutants into the waters of the United States violating the Clean Water Act and the rules adopted by the Water Pollution Control Board. Leachate from Phase 3, Section 1 is discharged through a drainage ditch into Boggs Ditch and contaminated runoff from Phase 1 discharges through a pipe under State Road 25. Additionally, surface water and waste were observed leaving the property to the south along an on-site road. On June 24, 2004, the facility submitted a letter to the IDEM regarding a "No Exposure Certification". The letter claims that the facility has no discharge of stormwater associated with industrial activities and that stormwater enters Boggs Ditch via sheet flow. The letter also stated that there are no other outfalls leaving the property.

ATTACHMENTS:

__X___ FACILITY MAP WITH LOCATION OF REGULATED WASTE ACTIVITY AND AREAS OF ENVIRONMENTAL CONCERN – Attachment 1 – Permitted Contour Map

__X___ PHOTO LOG – March 13, 2008, and June 17, 2008.

__X___ ADDITIONAL DOCUMENTATION - Attachment 2 - No Exposure Certification letter dated June 24, 2004.

Photo 1

Location and Subject: East side of Phase 1, facing west – Exposed area of Phase 1 where runoff migrates to the drainage ditch north of the landfill and then to the outfall at State Road 25.

Photo 2

Location and Subject: East side of Phase 1, facing northwest – Exposed area of Phase 1 where runoff migrates to the drainage ditch north of the landfill and then to the outfall at State Road 25.

Photos taken by Mark Espich

Photo 3

Location and Subject: East side of Phase 1, facing north. – Erosion cut in an uncovered portion of the landfill. Runoff from this area discharges to the outfall at State Road 25 from the drainage ditch north of the landfill.

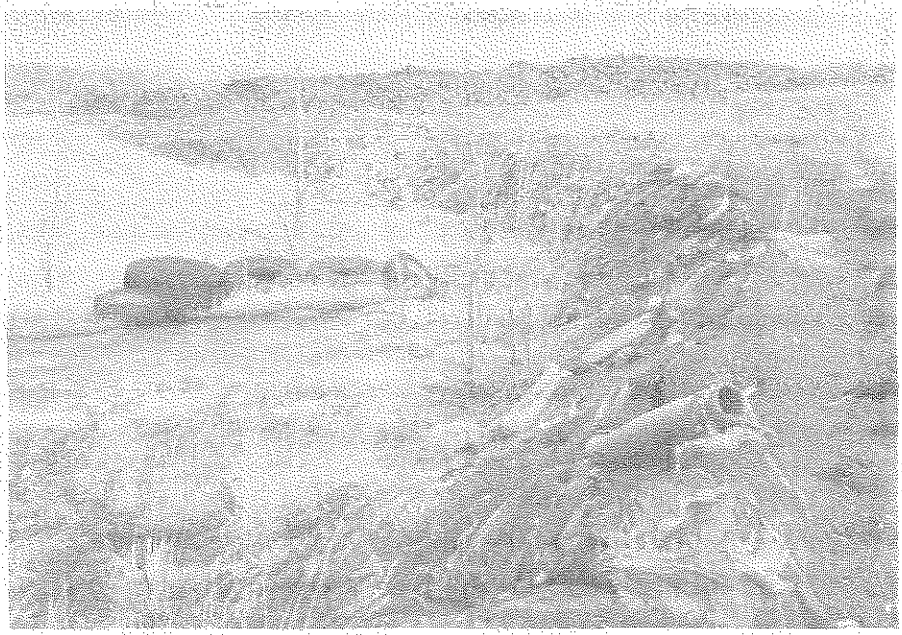


Photo 4

Location and Subject: East side of Phase 1, facing north. – Disposal of Grinder Dust and open dumping of waste tires and plastic piping in the landfill. Grinder Dust is a Type I waste and it is prohibited from disposal at this site.

Photos taken by Mark Espich

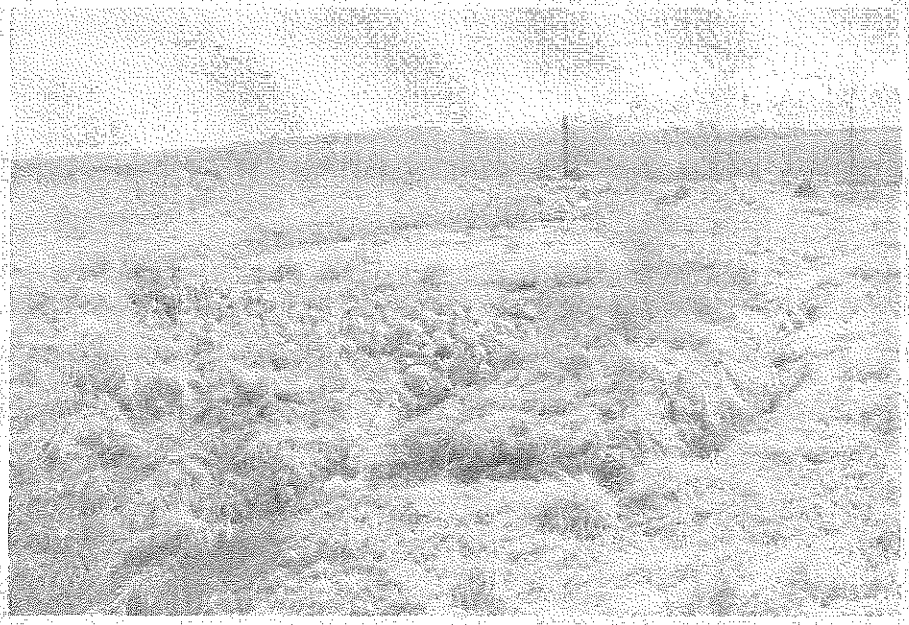


Photo 5

Location and Subject: North of Phase 1, facing south – Failure of sedimentation control device receiving runoff from the exposed portion of Phase 1.

Photo 6

Location and Subject: North of Phase 1, facing south – Runoff from Phase 1 migrating around the check dam. The sedimentation control devices were not being inspected or maintained to prevent the migration of wastes off-site.

Photos taken by Mark Espich

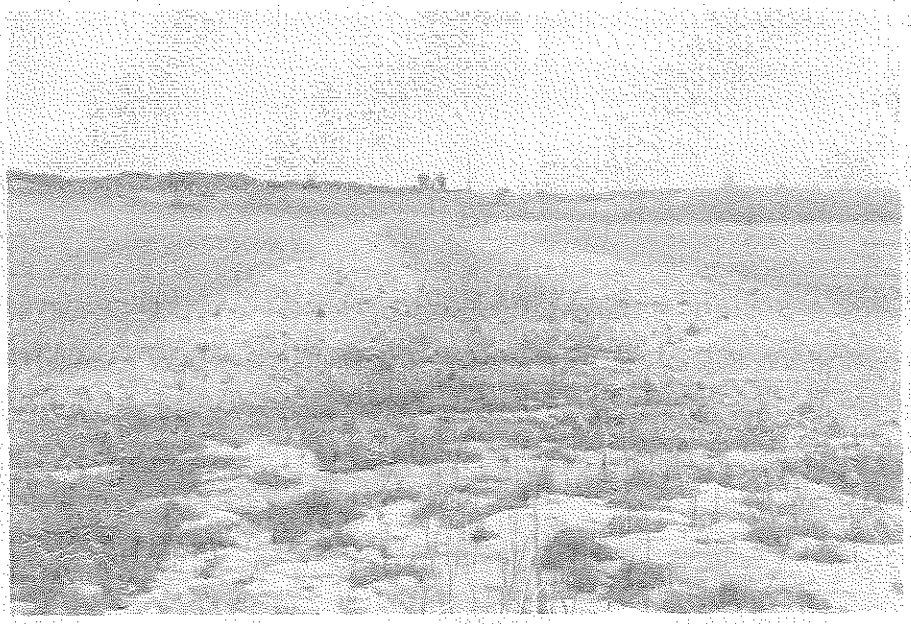


Photo 7

Location and Subject: Field north of Phase 1, facing south – Drainage ditch receiving runoff from Phase 1 and discharging to the outfall at State Road 25.

Photo 8

Location and Subject: Field north of Phase 1 – Close up of contamination in the drainage ditch discharging to the outfall at State Road 25.

Photos taken by Mark Espich

Photo 9

Location and Subject: Field north of Phase 1 – Outfall at State Road 25 receiving runoff from the drainage ditch north of Phase 1.

Photo 10

Location and Subject: Working face of Phase 3, Section 1 – Large area of exposed working face promoting erosion by surface water and allowing surface water to contact the waste.

Photos taken by Mark Espich

Photo 11

Location and Subject: Working face of Phase 3, Section 1 – Large area of exposed working face promoting erosion by surface water and allowing surface water to contact the waste.

Photo 12

Location and Subject: Working face of Phase 3, Section 1 – Large area of exposed working face promoting erosion by surface water and allowing surface water to contact the waste. The leachate from the bottom of this fill area discharges to a drainage ditch located in the northeast corner of the cell and eventually into a wetland area and Boggs Ditch.

Photos taken by Mark Espich

Photo 13

Location and Subject: Working face of Phase 3, Section 1, facing east – Erosion of the exposed working face migrating to the northeast drainage ditch.

Photo 14

Location and Subject: Working face of Phase 3, Section 1, facing northeast – Water ponding on the surface of the working face and a corroded 55-gallon container of unknown material in the disposal area.

Photos taken by Mark Espich

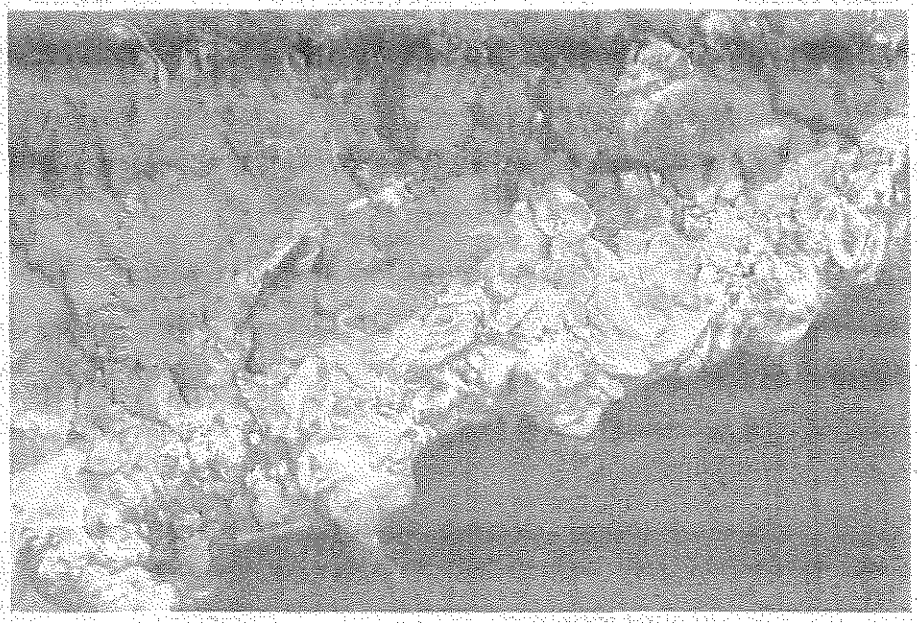


Photo 15

Location and Subject: Working face of Phase 3, Section 1 – Unknown material precipitating out of the ponded water and waste at the working face. This material was also observed at the Dalton Kendallville restricted waste site.

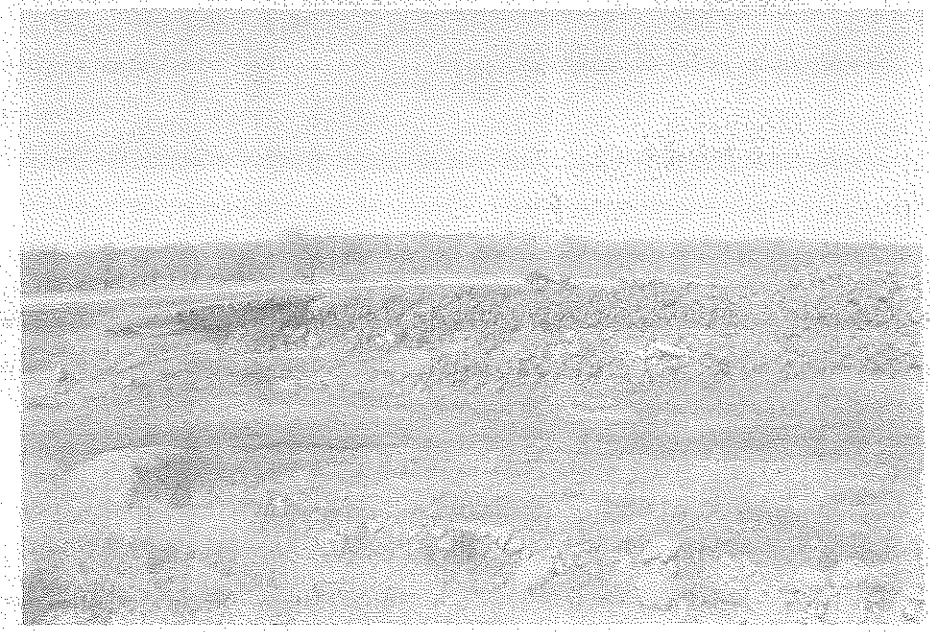


Photo 16

Location and Subject: Phase 2, facing northwest – Large pile of slag deposited near the border of Phase 2 and Phase 3. The slag pile is approximately 250 yards by 100 yards and ranging from 5 to 15 feet in height.

Photos taken by Mark Espich

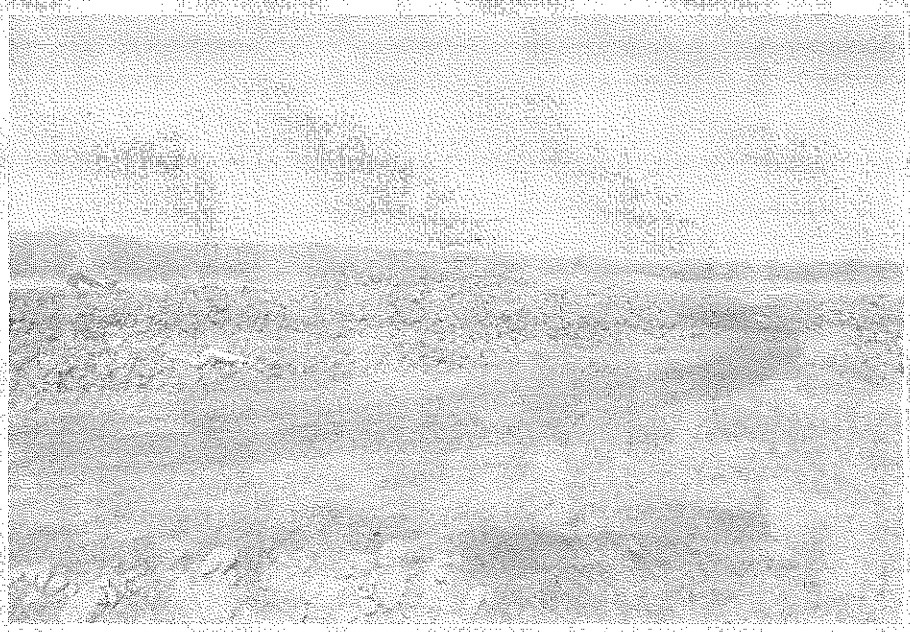


Photo 17

Location and Subject: Phase 2, facing north – Large pile of slag deposited near the border of Phase 2 and Phase 3 exceeding the height limit.

Photo 18

Location and Subject: Phase 2, facing northeast – Large pile of slag deposited near the border of Phase 2 and Phase 3. The facility's request for beneficial reuse of the slag was denied based on the waste being classified as Type II.

Photos taken by Marie Espich

Photo 19

Location and Subject: Phase 2, facing northeast – Large pile of slag deposited near the border of Phase 2 and Phase 3. The slag pile is approximately 250 yards by 100 yards and ranging from 5 to 15 feet in height.

Photo 20

Location and Subject: Phase 2, facing south – Runoff from Phase 2 migrating south into a farm field.

Photo 21

Location and Subject: Phase 2 – Foundry waste on the road near the southern property line.

Photo 22

Location and Subject: Near the facility boundary on the south side of Phase 2, facing north – Runoff from Phase 2 migrating off-site into a farm field south of the landfill.

Photos taken by Mark Espich

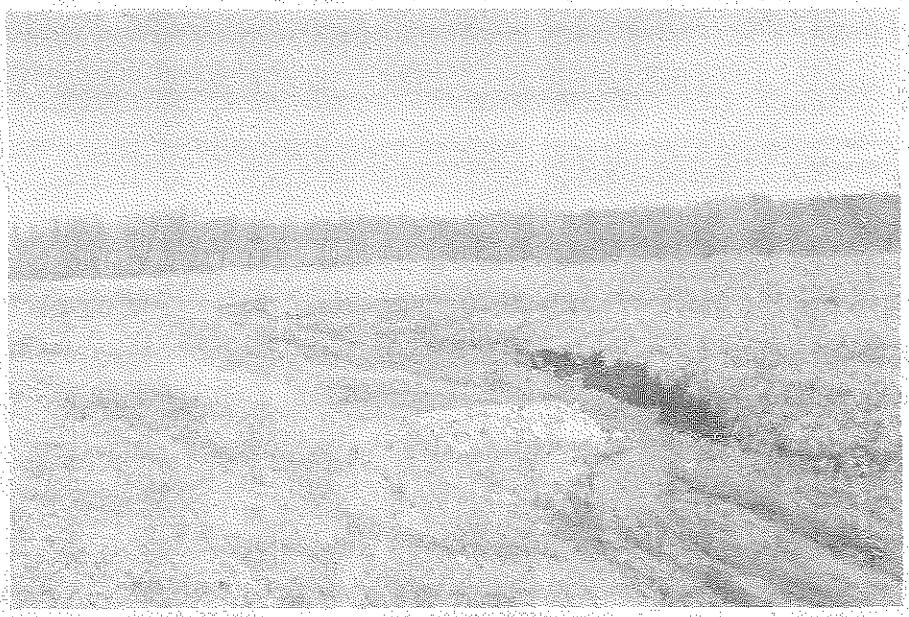


Photo 23

Location and Subject: Northeast corner of Phase 3, Section 1, facing north – Leachate discharging to the drainage ditch from the active fill area shown in photos 10-13. The sedimentation controls were not being inspected and were not maintained to prevent contamination from migrating off-site.

Photo 24

Location and Subject: Northeast of Phase 3, Section 1, facing north – Drainage ditch from the active fill area discharging leachate to the wetlands and into Boggs Ditch.

Photos taken by Mark Espich

Photo 25

Location and Subject: Northeast of Phase 3, Section 1 – Drainage ditch contaminated with leachate discharging to the wetlands and into Boggs Ditch.

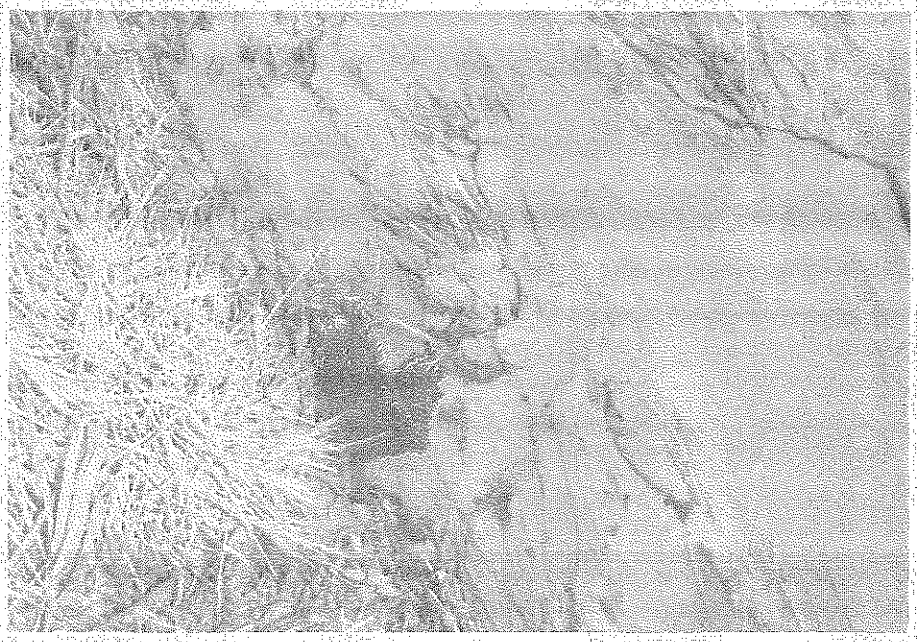


Photo 26

Location and Subject: Northeast of Phase 3, Section 1 – Drainage ditch contaminated with leachate.

Photos taken by Mark Espich

Photo 27

Location and Subject: Wetland Area and Boggs Ditch north of the landfill – Area receiving leachate from the landfill.

Photo 28

Location and Subject: Wetland Area and Boggs Ditch north of the landfill – Area receiving leachate from the landfill.

Photos taken by Mark Espich

Photo 29

Location and Subject: West of the entrance, inside the facility boundary – Solid waste dumped inside the facility boundary. Access to the facility is not controlled. The gate is locked after hours.

Photo 30

Location and Subject: Entrance to the facility – Gate is left unsecured during the day and locked after hours.

Photos taken by Mark Espich

Photo 1

Location and Subject: West side of Phase 3, Section 1, facing south – Erosion of buried waste caused by surface water runoff from the top of the fill area and migrating into the bottom of the fill area.

Photo 2

Location and Subject: West side of Phase 3, Section 1, facing east – Erosion of buried waste caused by surface water runoff from the top of the fill area and migrating into the bottom of the fill area.

Photos taken by Alan Minnie

Photo 3

Location and Subject: West side of Phase 3, Section 1, facing east – Erosion of the clay side walls along the northern side of the fill area.

Photo 4

Location and Subject: West side of Phase 3, Section 1, facing east – Erosion of the buried waste and clay side walls along the northern side of the fill area migrating into the bottom of the fill area.

Photos taken by Alan Minne

Photo 5

Location and Subject: West side of Phase 3, Section 1, facing east – Erosion of the buried waste and waste coming into contact with surface water/leachate.

Photo 6

Location and Subject: West side of Phase 3, Section 1, facing southeast – Erosion of the buried waste migrating into the bottom of the fill area.

Photos taken by Alan Minne

Photo 7

Location and Subject: West side of Phase 3, Section 1, facing east – Working face of the fill area.

Photo 8

Location and Subject: West side of Phase 3, Section 1, facing east – Working face of the fill area with ungraded piles and visible signs of erosion caused by surface water.

Photos taken by Alan Minnie

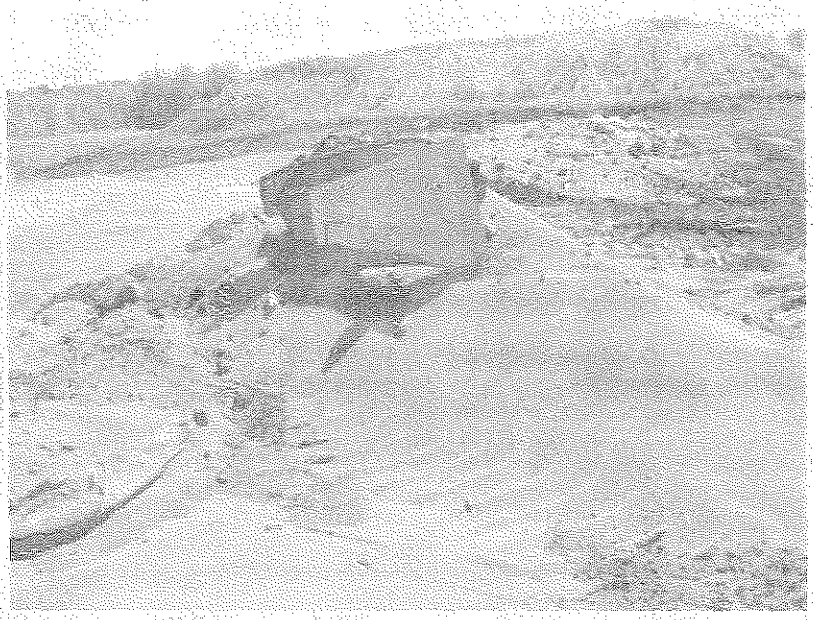


Photo 9

Location and Subject: South side of Phase 3, Section 1, facing northeast – Open dumping of solid waste at the working face.

Photo 10

Location and Subject: South side of Phase 3, Section 1, facing east – Piles of yard clean up.

Photos taken by Alan Minne

Photo 11

Location and Subject: Southeast side of Phase 3, Section 1 facing north – Working face of the fill area extending past the clay liner. The leachate collection sump is located in the background.

Photo 12

Location and Subject: West side of Phase 3, near Phase 2 border – Metal salvaging operation storing material on the ground without prior approval from the commissioner.

Photos taken by Alan Minnie

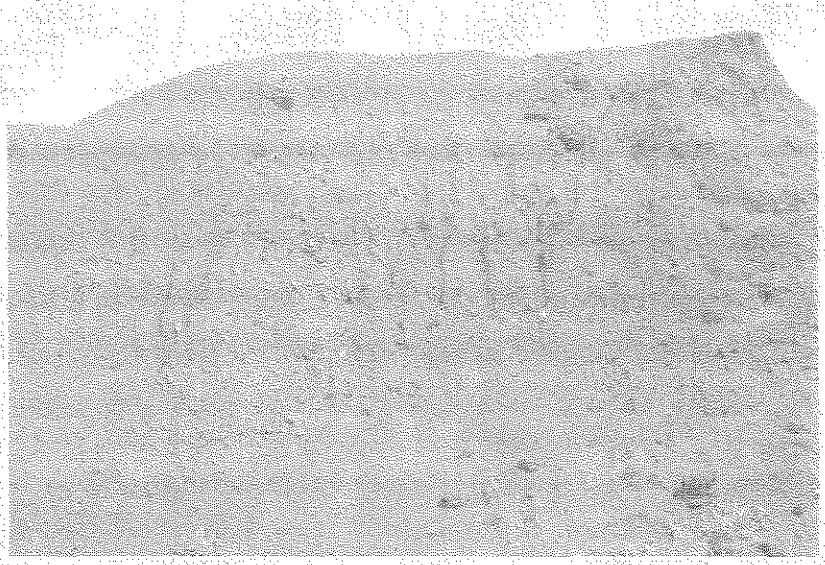


Photo 13

Location and Subject: West side of Phase 3, near Phase 2 border – Metal salvaging materials stored on the ground.

Photo 14

Location and Subject: Phase 2 – Large pile of slag deposited near the border of Phase 2 and Phase 3. The slag pile is approximately 250 yards by 100 yards and ranging from 5 to 15 feet in height.

Photos taken by Alan Minne

Photo 15

Location and Subject: Phase 2 – Large pile of slag deposited near the border of Phase 2 and Phase 3 exceeding the height limit.

Photo 16

Location and Subject: Phase 2, facing northeast – Large pile of slag deposited near the border of Phase 2 and Phase 3. The facility's request for beneficial reuse of the slag was denied based on the waste being classified as Type II.

Photos taken by Alan Minne

Photo 17

Location and Subject: East side of Phase 1 – Open dumping of waste tires and plastic piping in the landfill. These wastes were also observed during the March 13, 2008, inspection.

Photo 18

Location and Subject: East side of Phase 1 – Disposal of grinder dust that is a Type I waste prohibited from disposal at this site.

Photos taken by Alan Minne

Photo 19

Location and Subject: Phase 1 – Erosion in the intermediate cover near monitoring well 10.

Photo 20

Location and Subject: Southside of Phase 2 – Erosion, ponding water, and exposed waste along the southern boundary.

Photos taken by Alan Minnie

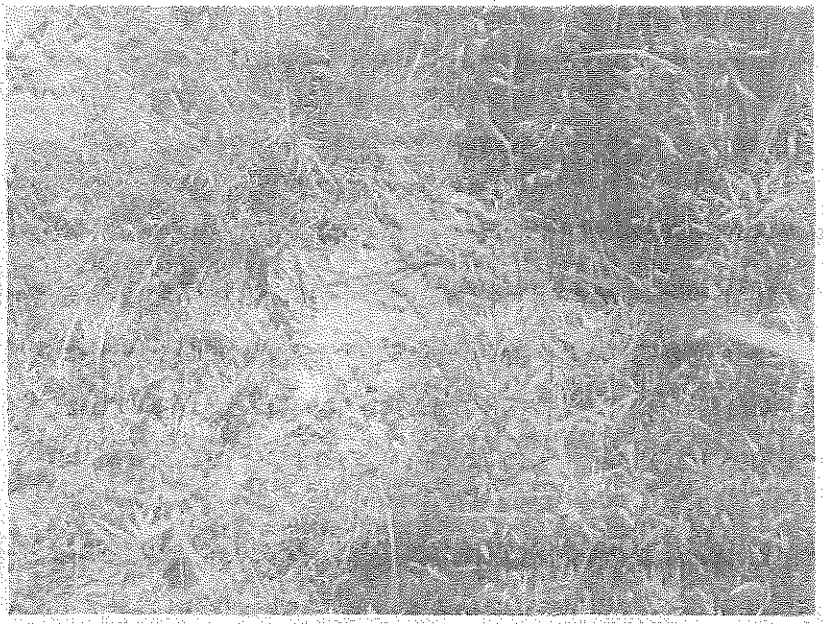


Photo 21

Location and Subject: South side of Phase 2 – Exposed waste along the southern boundary.

Photo 22

Location and Subject: South side of Phase 2 – Exposed waste along the southern boundary.

Photo 23

Location and Subject: South side of Phase 2 – Ponding water and large trees on the disposal area along the southern boundary.

Photo 24

Location and Subject: South side of Phase 2 – Leachate on the surface of the disposal area along the southern boundary.

Photos taken by Alan Minnie

Photo 25

Location and Subject: East side of Phase 2 – Erosion cut through the cap exposing the buried waste.

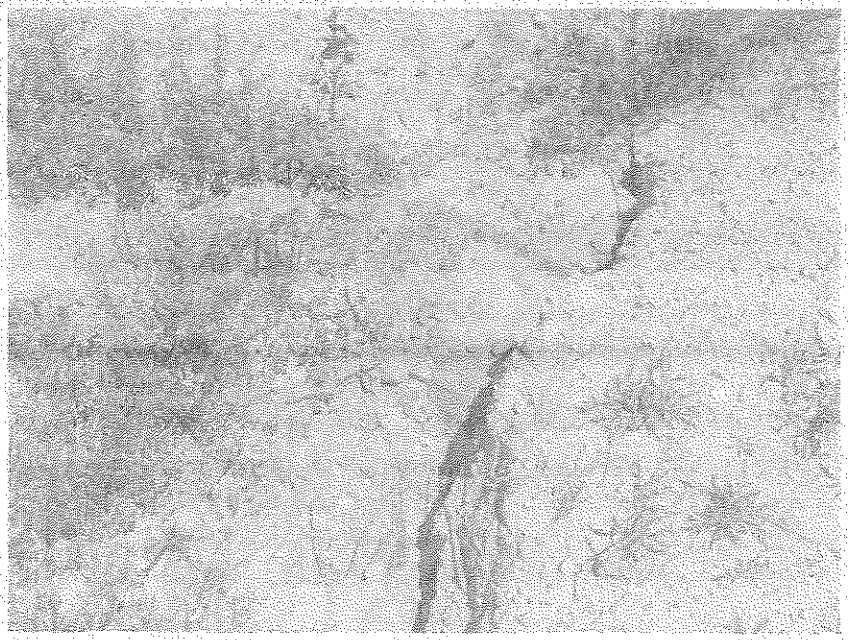


Photo 26

Location and Subject: East side of Phase 2 – Erosion cut through the cap exposing the liner.

Photo 27

Location and Subject: East side of Phase 2 – Large erosion cut through the cap exposing the buried waste.

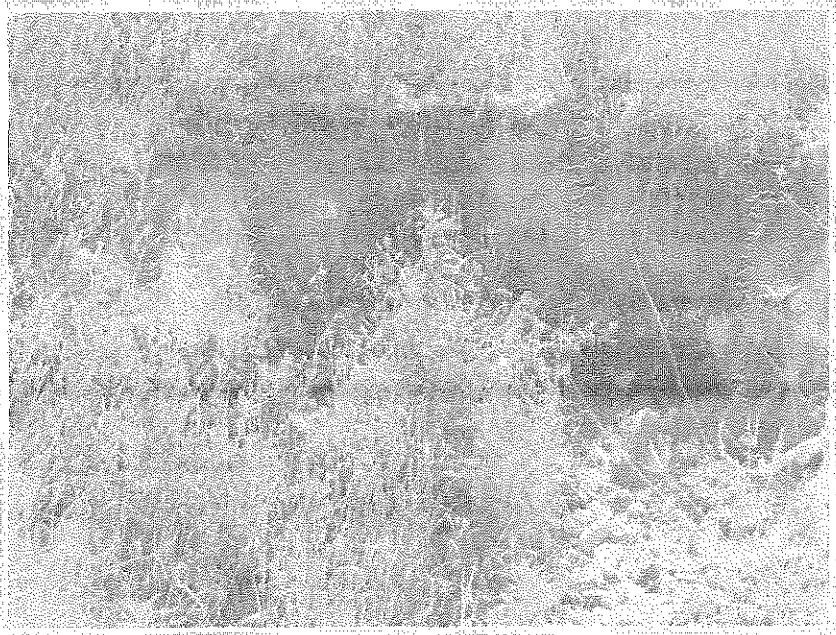


Photo 28

Location and Subject: Northeast side of Phase 2 – Large erosion cut through the cap, buried waste, and into the bottom clay liner.

Photos taken by Alan Mimms

Photo 29

Location and Subject: Northeast side of Phase 2 – Large erosion cut through the cap, buried waste, and into the bottom clay liner. The ravine was approximately 12 feet deep and discharges to the wetland north of the fill area.

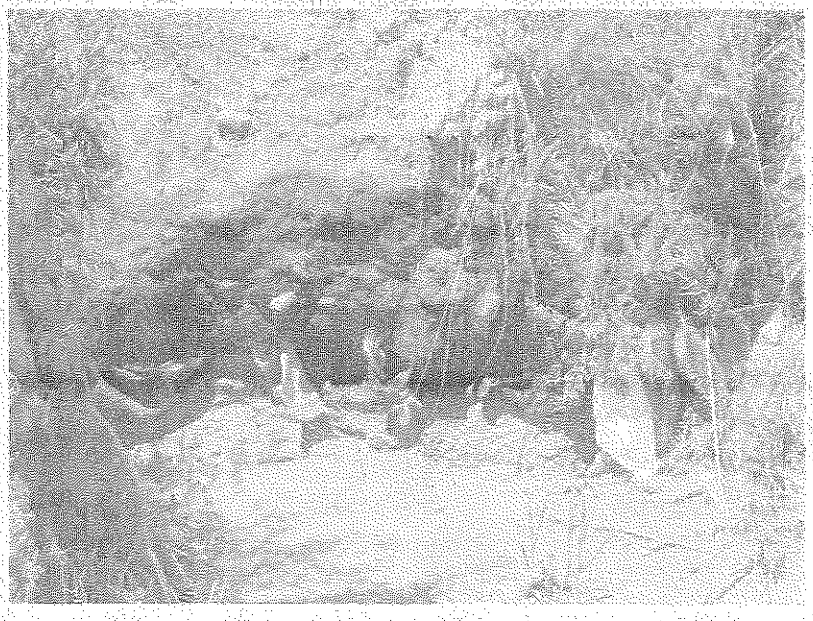


Photo 30

Location and Subject: Northeast side of Phase 2 – Close up of the erosion cut showing the exposed waste and damage to the bottom clay liner.

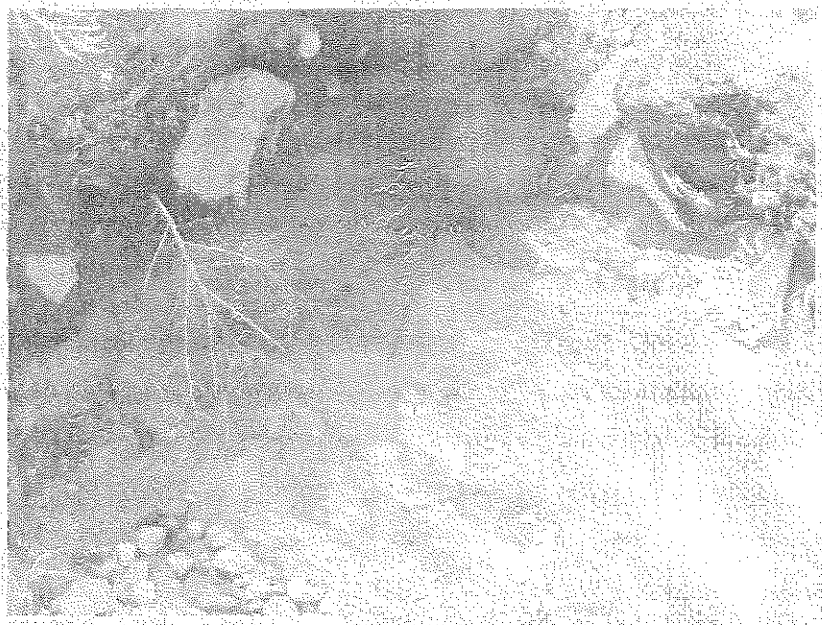


Photo 31

Location and Subject: Northeast side of Phase 2 – Close up of the erosion cut showing the exposed waste and damage to the bottom clay liner.

Photo 32

Location and Subject: Northeast side of Phase 2 – Close up of the erosion cut showing exposed waste.

Photo 33

Location and Subject: East side of Phase 2, facing north – Erosion cut discharging waste and sediment into the wetland to the north of the fill area.

Photo 34

Location and Subject: Unconstructed area of Phase 3 – Sedimentation in the wetland area from the large erosion cut on the northeast side of Phase 2.

Photos taken by Alan Minnie

Photo 35

Location and Subject: North of Phase 3, Section 1, facing south – Drainage ditch receiving leachate from the active fill area.

Photo 36

Location and Subject: North of Phase 3, Section 1, facing north – Drainage ditch receiving leachate from the active fill area and discharging to the wetland area and Boggs Ditch.

Photos taken by Alan Minnie

Photo 37

Location and Subject: North of Phase 3, Section 1, facing north – Damaged check dam allowing leachate from the active fill area to discharge to the wetland area and Boggs Ditch to the north.

Photo 38

Location and Subject: North of Phase 3, Section 1, facing north – Damaged check dam allowing leachate from the active fill area to discharge to the wetland area and Boggs Ditch to the north.

Photos taken by Alan Minne

Photo 39

Location and Subject: Northeast side of Phase 3, Section 1, facing south – Active fill area.

Photo 40

Location and Subject: Northeast side of Phase 3, Section 1, facing southwest – Working face and leachate in the bottom of the fill area.

Photos taken by Alan Minne

Photo 41

Location and Subject: Northeast side of Phase 3, Section 1, facing southwest – Working face and leachate in the bottom of the fill area.

Photo 42

Location and Subject: Northeast side of Phase 3, Section 1, facing southwest – Leachate collection sump not being utilized by the facility to collect and control leachate from migrating off-site.

Photos taken by Alan Minne

Photo 43

Location and Subject: Northeast side of Phase 3, Section I – Close up of leachate discharging to the drainage ditch and into the wetland area and Boggs Ditch to the north.

Photo 44

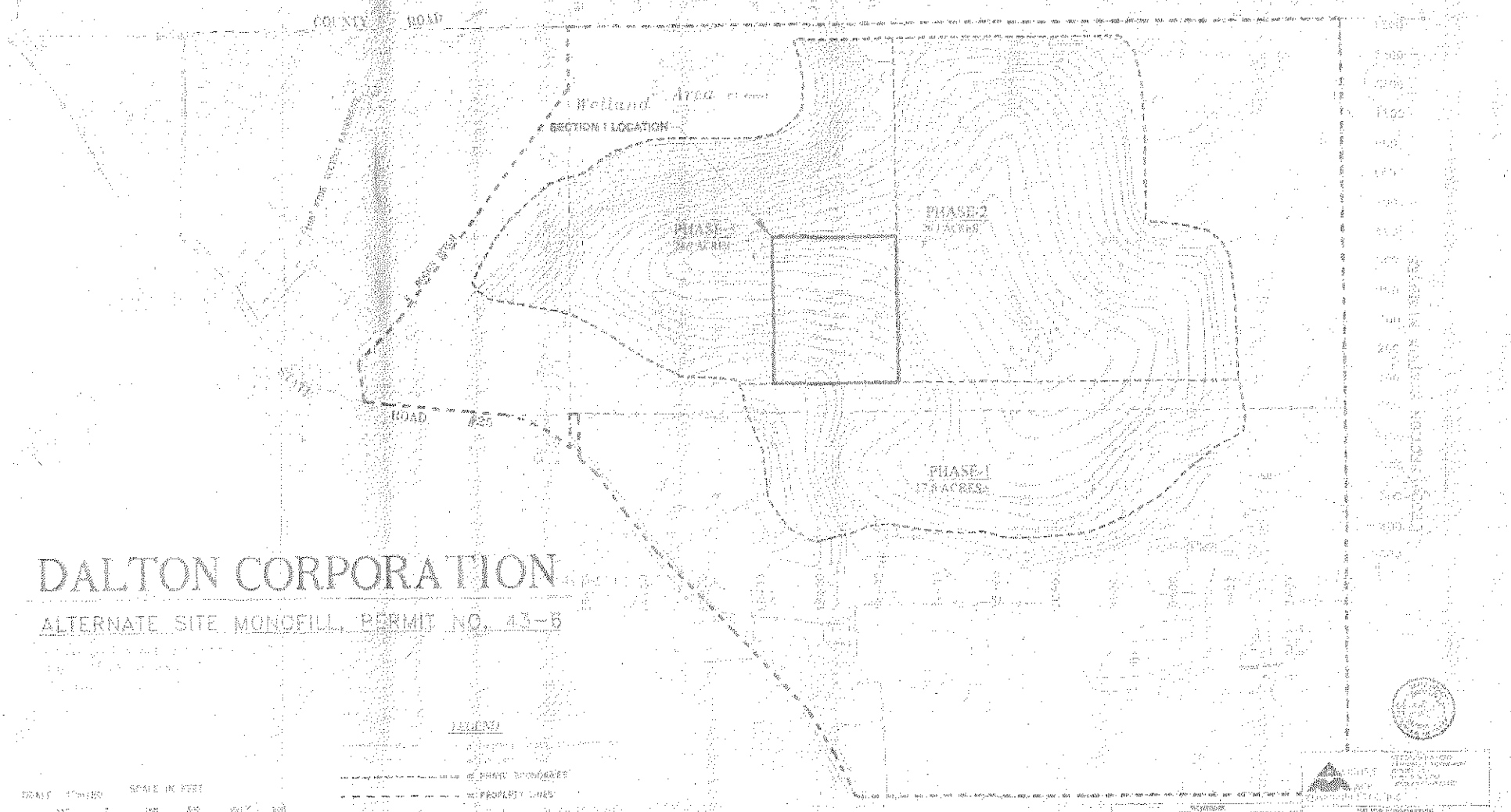
Location and Subject: Northeast side of Phase 3, Section I – Close up of leachate discharging to the drainage ditch and into the wetland area and Boggs Ditch to the north.

Photos taken by Alan Minnes.

ATTACHMENT 1

Permitted Contour Map

CURRENTLY PERMITTED FINAL CONTOURS FOR THE ALTERNATE SITE MONOFILL



DALTON CORPORATION

ALTERNATE SITE MONOFILL, PERMIT NO. 43-5

ATTACHMENT 2

No Exposure Certification Letter Dated June 24, 2004

AUGUST MACK ENVIRONMENTAL INC.
8007 CASTLETON ROAD
INDIANAPOLIS, INDIANA 46250
(317) 579-7400
(317) 579-7410 FAX

June 24, 2004

Mr. Craig Lawson
Indiana Department of Environmental Management
Office of Water Management
100 N. Senate Avenue
PO Box 6015
Indianapolis, Indiana 46206

Re: No Exposure Certification
Dalton Corporation
Alternate Site Monofill
Warsaw, Indiana
General Storm Water Permit # INR00D003
Solid Waste Facility Permit # FP 43-06
August Mack Project Number JE329.40

Dear Mr. Lawson:

August Mack Environmental, Inc., on behalf of Dalton Corporation, Warsaw Manufacturing Facility (Dalton), is submitting this "no discharge" certification for storm water associated with industrial activity at the site. The certification, signed by a Dalton official, is provided in Attachment A. Dalton currently utilizes the above referenced site for disposal of Type III foundry waste. The site is exposed to industrial activities during unloading of fill material. As noted in Figure 1 of Attachment B, Boggs Ditch runs through the property. Dalton originally applied for a storm water permit because it was assumed that the point where Boggs Ditch leaves the property would be classified as an outfall. It is August Mack's understanding that the presence of a stream or ditch entering or leaving the property alone is not classified as an outfall as defined in 327 IAC 5-1.5-38. In addition, storm water enters Boggs Ditch via sheet flow. No point sources enter Boggs Ditch. A further review of the drainage at the property revealed that no other outfalls were noted leaving the property boundary.

Since storm water associated with industrial activity does not leave the property via outfalls as defined in 327 IAC 5-1.5-38, Dalton is requesting the site be removed from the storm water general permit program and that the IDEM approve the "no discharge" certification for their Alternate Site Monofill.

If you should have any questions or require additional information please do not hesitate to contact us at (317) 579-7400.

Sincerely,

Eric Emmett
Project Engineer

Charles J. Staehler
Senior Engineer

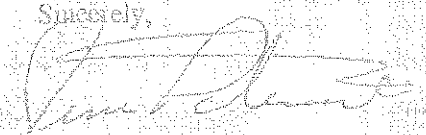
Enclosure

ATTACHMENT A

Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Jim Paterhuster
Dalton Corporation

ATTACHMENT B

Site Plan

DALTON FOUNDRY BUILDING

LINDBERG STREET

HENDRICKS STREET

P3-1N
P3-1W
P3-1
P3-1E
P3-1S

P3-2N
P3-2W
P3-2
P3-2S

NORTH

POND #3

3-E

3-W

3-S

UNPAVED ACCESS ROAD

POND #1

POND #2

P2TW1

1-W

1-E

2-S

P3-3N
P3-3W
P3-3
P3-3E
P3-3S

TRUCK SHOP

FENCE

CONRAIL RAILROAD LINE

LEGEND

APPROXIMATE LIMITS OF REAGENT APPLICATION ZONES

P3-3 SAMPLE LOCATION AND DESIGNATION

I-E DRYING AREA DESIGNATION

O:DWGS/DALTON/DALTFIG7.DWG

REVISIONS

NO.	DATE	DESCRIPTION	DRAWN BY
1	10/22/96	REVISED PER SPZ	DMM
2	11/19/96	REVISED PER SPZ	DMM

AUGUST MACK ENVIRONMENTAL, INC.
8007 CASTLETON ROAD
INDIANAPOLIS, INDIANA 46250
(317) 579-7400
FAX (317) 579-7410

THE DALTON FOUNDRIES, INC.
WARSAW, INDIANA

REAGENT APPLICATION ZONES

PROJECT No.:	DATE:
95246.30	10/25/96

SCALE:	DRAWN BY:	FIGURE No.:
	DMM	8

DALTON FOUNDRY BUILDING

LINDBERG STREET

PARKING

HENDRICKS STREET

NORTH

POND #3

3-E

3-W

UNPAVED ACCESS ROAD

POND #2

POND #1

1-W

1-E

2-S

3-S

TRUCK SHOP

FENCE

CONRAIL RAILROAD LINE

LEGEND

DEPTH OF EXCAVATION APPOX. 2 FEET

DEPTH OF EXCAVATION APPOX. 4 FEET

DEPTH OF EXCAVATION APPOX. 8 FEET

I-E DRYING AREA DESIGNATION

O: DWGS/DALTON/DALTALT2.DWG

REVISIONS			
NO.	DATE	DESCRIPTION	DRAWN BY
1	10/22/96	REVISED PER SPZ	DMM

AUGUST MACK ENVIRONMENTAL, INC.
8007 CASTLETON ROAD
INDIANAPOLIS, INDIANA 46250
(317) 579-7400
FAX (317) 579-7410

THE DALTON FOUNDRIES, INC.
WARSAW, INDIANA

EXTENT OF EXCAVATION FOR SOILS ABOVE THE CCLs

PROJECT No.:	DATE:
95248.30	10/25/96
SCALE: 1" = 50'	DRAWN BY: DMM
	FIGURE No.: 12

= SURFACE WATER FLOW DIRECTION
NOTE: SURFACE WATER LEAVES THE PROPERTY VIA SHEET FLOW AND SURFACE WATER DOES NOT LEAVE THE SITE VIA PIPELINES.
CROSS SECTION STATION NUMBERS

NOTICE OF INSPECTION
State Form 50890 (R3 / 11-05)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Telephone: (800) 451-6027 or (317) 232-8603

This is to notify you that on June 17, 2008 an inspection of Dalton Foundry - Warsaw was conducted by the undersigned representative of the Indiana Department of Environmental Management (IDEM), Office of Land Quality.

Type of Inspection (may include more than one):

- [X] Restricted Waste Site
- [ ] _____
- [ ] _____
- [ ] Complaint
- [ ] Multi-Media Screening Evaluation
- [ ] Other _____

Preliminary Inspection/Screening Findings:
These findings are considered preliminary and identify specific compliance issues discovered during the above-noted inspection that the designated agent of IDEM believes may be a violation of a statute(s), rule(s) or permit(s) issued by IDEM.

Single Media Inspection:

- [ ] No violations were discovered with respect to the particular items observed during the inspection.
- [ ] Violations were discovered but corrected during the inspection.
- [ ] Violations were discovered and require a submittal from you and/or follow-up inspection by IDEM.
- [X] Violations were discovered and may subject you to an appropriate enforcement response.
- [ ] Additional information/review is required to evaluate overall compliance.
- [ ] Other / Comments (attachment may be included) _____

Multi-Media Screening (Please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):

- [ ] Multi-media screening not conducted.
- [ ] No violations were discovered with respect to the limited multi-media screening conducted by IDEM.
- [ ] Potential violations were discovered but corrected during the inspection.
- [X] Potential violations were discovered and may be further investigated.

Pollution Prevention:
Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote changes in business and commercial operation, especially manufacturing processes, so that Indiana businesses increase productivity, generate less environmental wastes, reduce their regulatory responsibilities and become more profitable. Your participation in Indiana's pollution prevention program is entirely voluntary. If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance (OPPTA) at (317) 232-8172 or (800) 988-7901, or visit OPPTA's Web site at www.idem.IN.gov/oppta/p2/. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance? [ ] Yes [ ] No

Compliance Assistance:
In addition to the compliance assistance offered by IDEM's individual programs, IDEM's Compliance and Technical Assistance Program (CTAP) offers free, confidential compliance assistance to regulated entities, including small businesses and municipalities, throughout Indiana. In the future, if you would like to request free, confidential compliance assistance, call (317) 232-8172 or (800) 988-7901, or visit CTAP's Web site at www.idem.IN.gov/ctap.

A summary of violations and concerns noted during the inspection was verbally communicated to the undersigned representative during the inspection. The facility should correct any violations noted as soon as possible. Violations identified and corrected during the inspection may still be cited as violations.

A written inspection summary will be provided within 45 days. In accordance with IC 13-14-5-4, matters not evident to IDEM at the time of the inspection might not be included in either the verbal or written inspection summary.

IDEM Representative:

Printed Name	Signature	Phone Number	Date	Time
Mark Espich	Mark Espich	574/245-4872	6-17-2008	In: 10:00 am Out: 2:45 pm

Owner/Agent Representative:

Printed Name	Signature	Title	Phone Number	Date
Michael Schall	Michael Schall	Manager of Env. Eng.	574-372-1804	6/17/08

DISTRIBUTION: White – IDEM Public File; Canary – Office of Pollution Prevention and Technical Assistance [if OPPTA assistance is requested] or IDEM Representative (i.e., inspector) [if OPPTA assistance is not requested]; Pink – Owner/Agent Representative

NOTICE OF INSPECTION
State Form 50890 (R3 / 11-05)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Telephone: (800) 451-6027 or (317) 232-8603

This is to notify you that on March 13, 2008 an inspection of Dalton Foundry was conducted by the undersigned representative of the Indiana Department of Environmental Management (IDEM), Office of Land Quality.

Type of Inspection (may include more than one):

- [x] Restricted Waste Site
- [ ] _____
- [ ] _____
- [ ] Complaint
- [ ] Multi-Media Screening Evaluation
- [ ] Other _____

Preliminary Inspection/Screening Findings:
These findings are considered preliminary and identify specific compliance issues discovered during the above-noted inspection that the designated agent of IDEM believes may be a violation of a statute(s), rule(s) or permit(s) issued by IDEM.

Single Media Inspection:

- [ ] No violations were discovered with respect to the particular items observed during the inspection.
- [ ] Violations were discovered but corrected during the inspection.
- [x] Violations were discovered and require a submittal from you and/or follow-up inspection by IDEM.
- [ ] Violations were discovered and may subject you to an appropriate enforcement response.
- [ ] Additional information/review is required to evaluate overall compliance.
- [ ] Other / Comments (attachment may be included) _____

Multi-Media Screening (Please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):

- [x] Multi-media screening not conducted.
- [ ] No violations were discovered with respect to the limited multi-media screening conducted by IDEM.
- [ ] Potential violations were discovered but corrected during the inspection.
- [ ] Potential violations were discovered and may be further investigated.

Pollution Prevention:
Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote changes in business and commercial operation, especially manufacturing processes, so that Indiana businesses increase productivity, generate less environmental wastes, reduce their regulatory responsibilities and become more profitable. Your participation in Indiana's pollution prevention program is entirely voluntary. If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance (OPPTA) at (317) 232-8172 or (800) 988-7901, or visit OPPTA's Web site at www.idem.IN.gov/oppta/p2/. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance? ☐ Yes ☐ No

Compliance Assistance:
In addition to the compliance assistance offered by IDEM's individual programs, IDEM's Compliance and Technical Assistance Program (CTAP) offers free, confidential compliance assistance to regulated entities, including small businesses and municipalities, throughout Indiana. In the future, if you would like to request free, confidential compliance assistance, call (317) 232-8172 or (800) 988-7901, or visit CTAP's Web site at www.idem.IN.gov/ctap.

A summary of violations and concerns noted during the inspection was verbally communicated to the undersigned representative during the inspection. The facility should correct any violations noted as soon as possible. Violations identified and corrected during the inspection may still be cited as violations.

A written inspection summary will be provided within 45 days. In accordance with IC 13-14-5-4, matters not evident to IDEM at the time of the inspection might not be included in either the verbal or written inspection summary.

IDEM Representative:

Printed Name	Signature	Phone Number	Date	Time
Mark Espich	Mark Espich	574/245-4872	3-13-2008	In: / Out:

Owner/Agent Representative:

Printed Name	Signature	Title	Phone Number	Date
Michael Schall	Michael Schall	Manager of Env. Engineering	574-372-1804	3/13/08

DISTRIBUTION: White – IDEM Public File; Canary – Office of Pollution Prevention and Technical Assistance [if OPPTA assistance is requested] or IDEM Representative (i.e., inspector) [if OPPTA assistance is not requested]; Pink – Owner/Agent Representative

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

66-20-2 MCE/mlewis
Mr. Michael Schall
Dalton Corporation Warsaw
1900 East Jefferson Street
Warsaw, Indiana 46851

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☒ Agent ☐ Addressee

B. Received by (Printed Name) Barry Stanton | C. Date of Delivery 07-22-05

D. Is delivery address different from item 1? ☒ Yes
If YES, enter delivery address below: ☐ No
PO BOX 1388

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7002 0510 0004 2616 2121

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

(17)

1B1

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
HAZARDOUS WASTE LANDFILL INSPECTION REPORT

☐ COI ☐ EFI ☐

☐ CDI ☐

wishes to be contacted by OPPTA
No ☐

Please Print
Facility Name: ~~SAID ASGARI~~ SA. DALTON FOUNDRY

Location: 1900 E JEFFERSON STREET

City: WARSAW County: KOSCIUSKO Zip: 46580

Inspectors Name: SAID ASGARI

] LQG ☐	CEG ☐	NR ☐	UI ☐	Facility EPA I.D. Number	Inspector	Time	AM	PM	Date
Required	YES ☐	NO ~~☐~~		I N 0 0 5 1 4 6 0 2 2 (D)	S A	1 2 : 3 0		✓	0 9 2 3 0 3

A. GENERAL INFORMATION

Type and size of Operation —

THERE ARE THREE SURFACE IMPOUNDMENTS (PONDS) AND SIX SLUDGE DRYING AREAS AT THE DALTON FOUNDARIES INC. DALTON FOUNDARY OWNS AND OPERATES A GRAY IRON FOUNDRY THAT MANUFACTURES CASTINGS FOR THE AUTOMOTIVE AND APPLIANCE INDUSTRIES. BETWEEN 1993 AND 1996, DALTON UPGRADED ITS WASTEWATER TREATMENT SYSTEM, ELIMINATING THE NEED FOR THE THREE WASTEWATER PONDS AND SIX SLUDGE DRYING AREA.

↳ SAME INFO FROM PREVIOUS INSPECTION

Hazardous Waste Streams

EPA #/ Description	Source/Process	Generation Rate	Disposition
CADMIUM	FOUNDRY	—	
LEAD			
BARIUM			

1/6

Non-RCRA violations (open dumping, dumping in city sewer without pretreatment program, OSHA, etc.)

Additional Comments

SUBPART		B. GENERAL FACILITY STANDARDS	NA	NI	OK	DF
	264/265.14	Security			✓	
	264/265.15	General inspection requirements			✓	
	264/265.16(a)	Personnel Training (Program Adequacy)			✓	
	264/265.16(b) /	Personnel received training within six (6) months			✓	
	264/265.16(c)	Personnel received annual review			✓	
	264/265.16(d)	Training Documents: job titles, job description, type of training, training records			✓	
	264/265.17					
		C. PREPAREDNESS AND PREVENTION				
3	262.34 / 265.31	Maintenance & Facility Operation(must be maintained & operated to minimize possibility of release)			✓	
4	262.34 / 265.32	Required Equipment (a. Internal alarm/communication system b. External/telephone communication c. Fire extinguishers and spill control equipment d. water/foam)			✓	
5	262.34 / 265.33	Testing & Maintenance of Equipment			✓	
6	262.34 / 265.34	Communication & Alarm Access			✓	
8	262.34 / 265.37	Local Authority Arrangements (police, fire, hospital)			✓	

2/6

II. CONTINGENCY PLAN & EMERGENCY PROCEDURES		NA	NI	OK	DF
.262.34 / 265.51	Contingency Plan for Facility			✓	
2.34 / 265.52	Contingency Plan Content (SPCC plan, local arrangements, emergency coordinator, equipment list, evacuation plan, etc.)			✓	
262.34 / 265.53	Contingency Plan Available (on-site, local distribution)			✓	
262.34 / 265.54	Contingency Amendments (when regulations change, if plan fails, when facility makes changes)			✓	
262.34 / 265.55	Emergency Coordinator available			✓	
262.34 / 265.56	Emergency Procedures followed			✓	

ndiana Hazardous Waste Rules, 329 IAC 3.1, incorporates by reference federal standards which have been published in the Code of Federal Regulations as 40 CFR 260 gh 40 CFR 270. Citations reference the federal rules as incorporated, except where the State rule substitute full text language, in which case the specific 329 IAC 3.1 citatio ıe used.

ATTACH FACILITY MAP

Subpart N: Landfills

ments: _____

			NA	NI	OK	DF
		265.301 Design and Operating Requirements				
	265.301 (a)	Landfill units constructed after Jan. 29, 1992, must have double liners and leachate collection and removal system	✓			
	(b)	Must notify IDEM sixty days prior to receiving waste in a new unit	✓			
	(c)	Exemptions from (a)	✓			
	(d)	Monofills	✓			
	(e)	If liner leaks, replacement may be required	✓			
	(f)	Must have and maintain a proper run-on control system	✓			
	(g)	Must have and maintain a proper run-off control system	✓			
	(h)	Run-off and run-on collection and holding facilities must be emptied or managed expeditiously after storms to maintain capacity of system	✓			
	(i)	Wind dispersal of hazardous waste must be managed (daily cover)	✓			
		265.302 Action Leakage Rates				
)	265.302 (a)	Landfill must submit proposed action leakage rate; rate must be established	✓			
1	(b)	Requirements for action leakage rate (fluid head on liner must not exceed 1 foot)	✓			
2	(c)	To determine if action leakage rate has been exceeded, landfill must convert weekly or monthly flow rate to average daily flow rate for each sump	✓			
		265.303 Response Actions				
3	265.303 (a)	Landfill must submit response action plan which describes actions if action leakage rate is exceeded	✓			
4	(b)	If action leakage rate is exceeded, landfill must: notify IDEM, submit assessment, determine leak parameters, determine actions, submit report	✓			
5	(c)	To determine appropriate actions, facility must assess source of liquids	✓			
		265.304 Monitoring and Inspection Requirements				
6	265.304 (a)	Landfills required to have a leak detection system must record amount of liquid weekly while active	✓			
7	(b)	After final cover is installed, landfills must record liquid levels as required (monthly, quarterly, or semi-annual)	✓			
8	(c)	Landfill must establish "pump operating level"	✓			
		265.309 Surveying and Recordkeeping				
19	265.309 (a)	The landfill must maintain, on a map, the exact location and dimensions, including depth, of each cell with respect to permanently surveyed benchmarks	✓			
20	(b)	The landfill must maintain, in the operating record, the contents of each cell and approximate location of each type of hazardous waste within each cell	✓			

		NA	NI	OK	DF
	265.310 Closure and post-closure care				
265.310(a)(1)	The owner/operator must cover the landfill/cell with a final cover. The cover must be designed and constructed to:	✓			
(a)(2)	Minimize migration of liquids through the closed landfill	✓			
(a)(3)	Function with minimum maintenance	✓			
(a)(4)	Accommodate settling and subsidence so cover's integrity is maintained	✓			
(a)(5)	Have permeability less than or equal to bottom liner or subsoils	✓			
265.310 (b)	The owner/operator must comply with all post closure requirements in 275.117 through 265.120. The owner/operator must:	✓			
(b)(1)	Maintain integrity and effectiveness of the final cover, including making repairs to the cover as necessary to correct settling, subsidence, erosion, etc.	✓			
(b)(2)	Maintain and monitor leak detection system	✓			
(b)(3)	Maintain and monitor groundwater monitoring system	✓			
(b)(4)	Prevent run-on and run-off from eroding or damaging the cover	✓			
(b)(5)	Protect and maintain surveyed benchmarks	✓			
	265.312 Special requirements for ignitible or reactive wastes				
265.312 (a)	Ignitible or reactive wastes must not be placed in a landfill unless requirements of 40CFR 268 are met	✓			
(b)	Certain ignitible wastes in containers may be disposed in certain conditions	✓			
	265.313 Special requirements for incompatible wastes				
265.313	Incompatible waste must not be placed in the same landfill cell	✓			
	265.314 Special requirements for bulk and containerized liquids				
265.314 (a)	Pre-1985 disposal	✓			
(b)	Bulk or non-containerized hazardous waste with free liquids are prohibited from disposal after 1985	✓			
(c)	Containers with free liquids are prohibited	✓			
(d),(e),(f),(g)	Additional restrictions on liquids (test methods, sorbents, non-hazardous liquid)	✓			
	265.315 Special requirements for containers				
265.315 (a)	Containers must be 90 percent full when placed in the landfill; or	✓			
(b)	crushed, shredded, or similarly reduced in volume	✓			
	265.316 Disposal of small containers of hazardous waste in overpack drums (lab packs)				
265.316 (a)	Hazardous waste must be packaged in non-leaking inside containers	✓			
(b)	Inside containers must be overpacked in DOT-approved drum with sufficient amount of sorbents	✓			
(c)	Sorbent material must be appropriate	✓			
(d)	Incompatible wastes must not be placed in same container	✓			
(e)	Reactive waste must be treated or rendered non-reactive	✓			
(f)	Disposal must be in compliance with 40 CFR 268	✓			

Indiana Department of Environmental Management
VERIFICATION OF INSPECTION

This is to verify that on 9/23/03 an inspection of ~~LAND~~ DALTON FOUNDRY was conducted by the undersigned representative of the Indiana Department of Environmental Management, Office of ~~LAND~~ Quality.

Type of Inspection (may include more than one):

_____
_____
_____

____ Complaint
____ Multi-Media Screening Evaluation
X Other ~~SURFACE IMPOUNDMENTS~~ (PONDS)

Preliminary Inspection/Screening Findings
*These findings are considered preliminary and include specific matters discovered during the inspection that the designated agent of the department believes may be a violation of law or a permit issued by the department.

Single Media Inspection:

X No violations were discovered with respect to the particular items observed during the inspection.
____ Potential violations were discovered but corrected during the inspection.
____ Potential violations were discovered and require a submittal and/or follow-up inspection.
____ Potential violations were discovered and may be referred to our Office of Enforcement.
____ Additional information/review is required to evaluate overall compliance.
____ Other/Comments (attachment may be included)_____

_____

Multi-Media Screening (please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):

____ Multi-Media Screening not conducted.
____ Potential problems or potential violations were discovered but corrected during the inspection.
____ Potential problems or potential violations were discovered and will be referred to the Office(s) of _____ for further investigation and response.

Pollution Prevention:
Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote changes in business and commercial operation, especially manufacturing processes, so that less environmental wastes are generated. Your participation in Indiana's pollution prevention program is entirely voluntary. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance? ____Yes ____ No

If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance at 317/233-5627 or 1-800/988-7901 or visit their Web site at http://www.IN.gov/idem/oppta/p2/.

A summary of violations and concerns noted during the inspection were verbally communicated to the undersigned representative during the inspection. The facility should correct any deficiencies noted as soon as possible. Corrections made and verified during the inspection may still be cited as violations.

X Written inspection summary will be provided within 45 days. ____ Written report provided at the conclusion of the inspection.

IDEM Representative:

Printed Name	Signature	Phone Number	Date	Time
SAID ASGARI	Said Asgari	317 308-3163	9/23/03	In: 11 A.M. Out: 12:30 P.M.

Owner/Agent Representative:

Printed Name	Signature	Title	Phone Number	Date
Boyd A. Wear	Boyd A. Wear	Mgr. Engrg	574 372-1837	9-23-03

State Form 50890 (4-02)

6/6

(19)

Kosciusko NO

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

IB1

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

VIA CERTIFIED MAIL 7000 0520 0023 5041 4498 November 28, 2001

Mr. Boyd A. Wear, Director
Dalton Foundry
Warsaw Manufacturing Facility
Plant Engineering
P.O. Box 1388
Warsaw, Indiana 46581-1388

Dear Mr. Wear:

Re: Inspection Results
Industrial Waste Management
Compliance Evaluation
Dalton Foundry
EPA I.D. No. IND005146022
Warsaw, Kosciusko County

Representatives of the Department of Environmental Management (Department) are conducting inspections of facilities in Indiana that are engaged in the generation, transportation, treatment, storage, or disposal of industrial waste. Facilities are being inspected to determine compliance with, but not limited to, "Environmental Management Act"; IC 13, "Indiana Administrative Code"; 329 IAC 3.1, "Hazardous Waste Management Permit Program and Related Hazardous Waste Management Requirements"; 329 IAC 3.1, "Solid Waste Land Disposal Facilities"; 329 IAC 10, 11 and 12, "Used Oil Management"; 329 IAC 13, and rules promulgated pursuant to those statutes. These inspections and record reviews are also being conducted pursuant to the requirements of the Resource Conservation and Recovery Act (RCRA), Public Law 94-580, as amended, for authorized state hazardous waste management programs.

This is to inform you that on October 24, 2001, I conducted an inspection of Dalton Foundry, Inc., located at Warsaw, Indiana. You represented your firm. For your information, a summary of the inspection report is provided below:

Type of Inspection:
__ Complete Industrial Waste Inspection
X Limited Industrial Waste Inspection
__ Complaint
__ Other:_____

Results of Inspection:

__ Additional information is required to evaluate overall compliance. You will receive a completed report within 30 days.

X In compliance, no violations observed.

__ In compliance, violations were observed but were corrected during the inspection. See inspection report.

__ Violations were observed and require a follow-up inspection. See inspection report. Re-inspection will be conducted after _____.

__ Violations were observed and require a submittal. See inspection report. Submittal is due _____.

__ Violations were observed and are being referred to our Office of Enforcement. See inspection report.

Please direct any response to this letter and any questions to me at (317)308-3163.

Sincerely,

Said Asgari

Said Asgari
Environmental Engineer
Technical Compliance Section
Compliance and Response Branch
Office of Land Quality

Enclosure
cc: Kosciusko County Health Department

(21)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

VIA CERTIFIED MAIL 7000 0520 0023 5042 6637

November 12, 2003

Mr. Boyd A. Wear, Director
Dalton Foundries, Inc.
P.O. Box 1388
1900 East Jefferson Street
Warsaw, Indiana 46581-1388

Re: Inspection Summary Letter
Dalton Foundries, Inc.
IND005146022
Warsaw, Kosciusko County

Dear Mr. Wear:

On September 23, 2003, a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Dalton Foundries, Inc., 1900 East Jefferson Street, Warsaw, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection:

___ Complete Industrial Waste Inspection
___ Limited Industrial Waste Inspection
___ Complaint
_X_ Other __Surface Impoundments_____

Results of Inspection:

_X_ No violations were observed
___ Violations were observed but corrected during the inspection. See inspection report.
___ Violations were observed. See inspection report.
___ Additional information/review is required to evaluate overall compliance.
___ Violations were observed and will be referred to the Office of Enforcement. See inspection report.

Please direct any response to this letter and any questions to me at (317) 308-3163.

Sincerely,

Said Asgari
Environmental Engineer
Industrial Waste Compliance Section
Compliance and Response Branch

Enclosure

cc: Kosciusko County Health Department

(24)

43-06

LANDFILL

2C1C
Dalton Foundry
State Rd 25 Monofill
Rubbish landfill
Kosciusko County

DALTON

Dalton Corporation

July 25, 2003

RECEIVED
JUL 28 2003
DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
OFFICE OF LAND QUALITY

CERTIFIED MAIL NO. 7001 1940 0000 6585 9692

Mr. John Hale
Permits Branch
Office of Land Quality
Indiana Department of Environmental Management
100 N. Senate Avenue, N1154
P.O. Box 6015
Indianapolis, IN 46206-6015

RE: Plan for Repair of Monitoring Well MW-6 and Replacement and Abandonment of Monitoring Well MW-12 Dalton Corporation, State Road 25 Monofill Site, Warsaw, Indiana/Permit FP 43-06

Dear Mr. Hale:

Transmitted herewith, on behalf of the Dalton Corporation, Warsaw Manufacturing Facility, of Warsaw, Indiana, are two (2) unbound copies of the plan for the repair of groundwater monitoring well MW-6 and the abandonment and replacement of groundwater monitoring well MW-12 at the Dalton Corporation, State Road monofill site (Solid Waste Facility Permit FP# 43-06), located southwest of Warsaw, Indiana. This plan was prepared by EIS Environmental Engineers, Inc. (EIS) of South Bend, Indiana, on behalf of the Dalton Corporation.

I am a duly authorized representative of the Dalton Corporation (the permittee) and, as required by the facility permit condition B4 and 329 IAC 10-11-3(b), I make the following certification regarding the subject plan:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons who managed the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. I further certify that I am authorized to submit this information.

Please feel free to call me at (574) 372-1804 if there are any questions regarding the subject plan.

Sincerely,

DALTON CORPORATION

Michael Schall

Michael Schall
Environmental Manager

Warsaw Manufacturing Facility
P.O. Box 1388
Warsaw, IN 46581-1388
(219) 267-8111

July 21, 2003

Mr. Michael Schall
Manager of Environmental Engineering
Dalton Corporation
1900 East Jefferson
PO Box 1388
Warsaw, IN 46581-1388

RE: Plan for Repair of Monitoring Well MW-6 and Replacement and Abandonment of Monitoring Well MW-12 Dalton Corporation, State Road 25 Monofill Site, Warsaw, Indiana / Permit FP 43-06

Dear Mr. Schall:

Transmitted herewith is the plan for the repair of groundwater monitoring well MW-6 and the abandonment and replacement of groundwater monitoring well MW-12 at the Dalton Corporation, State Road 25 monofill site (the Site) located in Warsaw, Indiana (Solid Waste Facility Permit FP# 43-06). This plan was prepared by Environmental Engineers, Inc., (EIS), on behalf of the Dalton Corporation, for submittal to the Indiana Department of Environmental Management (IDEM).

Possible problems with wells MW-6 and MW-12 were first suggested by unusual static water levels (SWLs) observed during the May 2003 sampling event at the Site (i.e. the SWL in well MW-6 was unusually low [dry], and the SWL in well MW-12 was unusually high. The unusual SWLs were noted in the groundwater monitoring report for the May 2003 sampling event (report dated July 2, 2003) prepared by EIS and submitted by the Dalton Corporation to the IDEM. The condition of wells MW-6 and MW-12 were inspected by EIS on July 10, 2003. It was then discovered that sediment in the lower part of well MW-6 prevented the detection of the SWL if the SWL was below the top level of the sediment in the well. It also was discovered that well MW-12 had a subsurface bend and a likely subsurface break in the well casing that prevented the use of sampling equipment for the collection of samples. Additional details regarding the condition of the wells are provided below.

On July 16, 2003, EIS, on behalf of Dalton Corporation, notified Ms. Kim Vedder, the IDEM Project Manager for the Site, of the results of the July 10, 2003, well inspection and the discovery that the well conditions were such that the wells were not functioning as intended. EIS conferred with the IDEM Project Manager to develop the following plan of action to remedy the problems with the condition of wells MW-6 and MW-12:

WELL MW-6:

Information Regarding Well MW-6:

Monitoring well MW-6 was installed in 1986 along the west side of Site. A map showing the location of well MW-6 is provided in Attachment C. The Subsurface Exploration Log (i.e. boring log) and the Monitoring Well Design Plan for Well MW-6 are provided in Attachment B. Monitoring well MW-6 was constructed with a 2-inch diameter, PVC casing and a 10-foot long, No. 10 slot, 2-inch diameter well screen. The screened interval of well MW-6 was set so as to monitor the deep, laterally continuous aquifer at the Site. Well MW-6 is not used for the collection of groundwater samples. However, the facility permit (permit renewal dated February 11, 2002) designates well MW-6 as one of several piezometers for the collection of SWL data at the Site. The SWL data from well MW-6 and from other wells at the Site screened in the deep aquifer are used to contour the potentiometric surface of the groundwater and to show the groundwater flow directions on maps. Attachment A provides groundwater flow maps using data from the February 2003 sampling event showing the groundwater flow directions indicated with and without SWL data from well MW-6. As is indicated in the maps, the use of SWL data from well MW-6 shows the groundwater flow direction to be about 15° more to the west than is indicated when SWL data from well MW-6 is not used. Therefore, although it helps to better define the groundwater flow directions, the use of SWL data from well MW-6 does not substantially change the overall northwest groundwater flow directions indicated for the west part of the Site.

According to the 1986 boring log, the base of well MW-6 was set at 86.35 feet below grade, the top-of-casing (TOC) was about 1.95 feet above grade, the surface elevation was 890.13 feet (N.G.V.D) and the TOC elevation was 892.08 feet (N.G.V.D). Given the initial grade elevation recorded in 1986, the base of the well was at set at an elevation of about 803.78 feet (N.G.V.D). However, given a more recent (February 19, 1998 survey) TOC elevation of 888.27 feet (N.G.V.D) and assuming that the height of the TOC has not been altered, the base of well MW-6 is calculated at an elevation of about 799.97 feet (N.G.V.D). It is not known why the 1986 TOC elevation and the 1998 elevation vary by 3.81 feet. However, it is noted that the current 0.8-foot height of the TOC above grade is less than the initial 1986 height of the TOC above grade of 1.95-foot. This suggests that the grade and/or the height of the TOC have changed since the installation of the well in 1986. It is known that the protective cover to well MW-6 was damaged sometime several years ago (prior to the 1998 survey). The damage was evidently caused by heavy equipment (e.g. earthmoving, mowing or farm equipment) hitting the protective cover and shearing off the upper part of the protective cover and the locked lid. The well was later secured with a locked, expandable well cap. It is not known whether or not the damage to the protective cover also caused damage to the well casing and TOC. There are no known records indicating exactly when the well was hit, the extent of the damage or if and how the well may have been repaired. Nevertheless, the available data indicate that the base of well MW-6 should be at an elevation of about 799.97 feet to 803.78 feet (N.G.V.D). However, on July 10, 2003, the depth of well MW-6 was measured at 65.0 feet below grade, which corresponds to an elevation of

823.27 feet (N.G.V.D). This indicates that the base of the well is about 19.5 feet to 23.3 feet shallower than expected. Particles on the probe tip used to measure the depth on July 10, 2003, suggest that fine sand and/or silt is at the base of the well. This indicates that sediment has filled the lower quarter of well MW-6. It is not known why sediment is in well MW-6. However, it may be related to possible damage caused when the protective cover was hit by heavy equipment.

The SWL checks conducted at the Site during the May 2003 monitoring event indicated that well MW-6 was dry. The SWL checks conducted at well MW-6 during July 2003 detected water at 64.85 feet, indicating a water interval in the well of only 0.15 feet. The SWL depth measured at well MW-6 in July 2003 was typical of historically detected SWLs at that well, and the corresponding SWL elevation of 823.42 feet was within the typical range for the deep aquifer. This suggests that water from the screened interval had flowed through and past the sediment in the well and that well MW-6 was still functioning as a piezometer. However, the limited amount of water in the well indicted that even a slight drop in the water level would render the well apparently dry and would prevent the use of the well as a piezometer.

Plan to Repair (and Abandon if needed) Well MW-6:

As is noted above, an interval of sediment in the lower part of well MW-6 prevents the use of the well as a piezometer when the SWL falls below the top of the sediment in the well. Removal of the sediment from well MW-6 will be needed to repair the well. Information from the July 10, 2003, well inspection indicates that the sediment is likely fine-grained material. Therefore, it should be possible to use water to flush the sediment out of the well. Clean, potable water will be pumped under pressure to the bottom of the well via a tremie pipe. The sediment will become suspended in the water and will flow with the water out the top of the well. If possible, all of the sediment will be removed from the well. However, it is noted that even the removal of some sediment from the well will allow the well to be used as a piezometer during normal fluctuations of the SWL in the deep aquifer. Therefore, the repair of well MW-6 will be considered successful if one (1) foot or more of the sediment is removed. The SWL and the depth to the sediment or bottom of the well will be checked and recorded before and after the repair of the well. After flushing the well, the water in the well will be purged a minimum of three well volumes in order to remove the water used to flush the well. A report documenting the repair of well MW-6 will be prepared for submittal by the Dalton Corporation to the IDEM.

It is expected that the repair of the well by flushing the sediment out of the well will be successful. However, in the event that the repair is not successful, well MW-6 will be abandoned. If the repair is unsuccessful and abandonment is needed, the well will be abandoned in accordance with applicable Indiana rules and regulations (i.e. 312 IAC 13). A licensed well driller will conduct the abandonment activities. An EIS geologist will be present at the Site to direct and document the abandonment activities. The sediment in the lower part of the well will likely prevent direct placement of grout in the lower part of the well casing and well screen. Therefore, over drilling the well to the initial well depth will be conducted as part of the

abandonment procedure for well MW-6. The abandonment procedures will include over drilling the well with a hollow-stem auger to the estimated initial well depth (i.e. 86.35 feet), removal as much as possible of the well casing and screen but at least the upper two feet (minimum) of well casing, grouting the entire length of the boring with bentonite, placement of a cement surface plug, and covering with clay material at the ground surface. The required well abandonment forms will be prepared and submitted to the Indiana Department of Natural Resources (IDNR), Division of Water. A report documenting the well abandonment will be prepared for submittal by the Dalton Corporation to the IDEM.

As noted above, well MW-6 is only used as a piezometer for the collection of SWL data. As shown in the groundwater flow maps provided in Attachment A, not using SWL data from well MW-6 will result in apparent change in the groundwater flow direction of about 15°. However, the overall northwest flow direction for that part of the Site still will be indicated and the evaluation of the adequacy of the monitoring system relative to flow directions still will be possible using the SWL data from other remaining wells at the Site. Therefore, replacement of well MW-6 should not be needed and is not planned. In the event that the abandonment of well MW-6 is necessary, it is requested that the IDEM remove well MW-6 from the permit list of designated piezometers for the Site.

WELL MW-12:

Information Regarding Well MW-12:

Monitoring well MW-12 was installed in 1990 in a wetland area along the north side of the Site. A map showing the location of well MW-12 is provided in Attachment C. The Subsurface Exploration Log (i.e. boring log) and the Monitoring Well Design Diagram for well MW-12 are provided in Attachment B. Monitoring well MW-12 was constructed with a 2-inch diameter, PVC casing and a 5-foot long, No. 10 slot, 2-inch diameter well screen. The screened interval of well MW-12 was set so as to monitor the deep, laterally continuous aquifer at the Site. Well MW-12 is used for the collection of semi-annual groundwater samples and SWL data in accordance with the facility permit (permit renewal dated February 11, 2002). Well MW-12 serves to monitoring the deep aquifer along the north part of the Site. SWL data from well MW-12 is used to determine the groundwater flow directions for the deep aquifer at the Site. The use of SWL data from well MW-12 is critical to show that groundwater flow in the deep aquifer evidently curves to the west in the north part of the Site.

Difficulties were encountered in sampling well MW-12 during the February 2003 semi-annual monitoring event. The difficulties were evidently caused by a subsurface bend in the well that prevented the use of a standard size bailer for purging and sampling. However, at that time, the bend was not substantial enough to prevent the use of a thinner diameter bailer, and the well was successfully purged and sampled. The collection of groundwater samples was not required and was not conducted during the subsequent May 2003 quarterly monitoring event; however, the

SWL at well MW-12 was checked. It was then noted that the SWL in well MW-12 was unusually high. SWL depths in well MW-12 typically have been about 30 feet below grade; however, the SWL depth in May 2003 was found to be only about 1.3 feet below grade. The unusually high SWL depth in May 2003 suggested a possible problem with the well, as was noted in the report for the May 2003 monitoring event. On July 10, 2003, EIS inspected the condition of well MW-12, and an unusually high SWL (about 5.4 feet below grade) was confirmed. The depth of the well was measured at about 59.1 feet below grade. It was found that a standard size bailer (1.6-inch diameter) could not pass beyond an obstruction (apparently a bend in the well casing) at about 11 feet below grade. About 0.5 gallons of water were purged with the standard size bailer, and the SWL was again checked. The SWL was then found to be at about 9.9 feet below grade and rising very slowly (about 0.01 foot/5 minutes). An attempt was then made to further purge the well with a thinner diameter (0.88-inch diameter) bailer. The thinner bailer was able to pass the obstruction at 11 feet below grade and was lowered to the bottom of the well. However, upon retrieval, the bailer encountered a sharp obstacle that it could not pass at about 21.5 feet below grade. It is assumed that the sharp obstacle at 21.5 feet below grade is likely a separation in well casing sections. In that the bailer could not be removed from the well, the bailer and the attached rope were left in the well, the well was capped and the protective cover was closed and locked.

It is noted that well MW-12 had been damaged and repaired in the past as a result of problems with the well casing bending to the point of structural failure. During the November 1999 sampling event, well MW-12 was found to be damaged and could not be sampled. The well casing had been compressed and bent below grade, evidently as the result of differential settlement of surficial soil fill placed over subsurface peat deposits. In February 2000, well MW-12 was repaired by removing and replacing the bent part of the well. Details regarding the 2000 repair were provided in a report previously provided to the IDEM. Sampling of well MW-12 resumed during the February 2000 sampling event and continued though the last sampling event for well MW-12 conducted during February 2003. As indicated above, a subsurface bend in the casing again was noted that caused difficulty in sampling well MW-12 during the February 2003 event. It is likely that the same factors that caused the casing to fail in 1999 caused the casing to fail again in 2003. It was noted that the wetland surrounding well MW-12 was flooded at the time of the May and July 2003 checks, and this combined with a possible structural failure of the well casing may explain the reported high water in well MW-12. It was concluded that the condition of well MW-12 renders it unfit for its intended function and that it needs to be repaired or replaced. However, another repair of well MW-12 is <u>not</u> recommended because the same factors that caused well MW-12 to fail in 1999 and 2003 likely will cause the well to fail again in the future. The primary factor for the failure of well MW-12 evidently is its location over a thick interval of unstable peat. The aerial distribution of the peat deposit at the Site is believed to be the same as the wetland area. Therefore, it is recommended that well MW-12 be abandoned and that a replacement well be installed in the general vicinity of well MW-12 but not in the wetland.

Plan to Abandon and Replace Well MW-12:

Well MW-12 will be abandoned in accordance with applicable Indiana rules and regulations (i.e. 312 IAC 13). A licensed well driller will conduct the abandonment activities. An EIS geologist will be present at the Site to direct and document the abandonment activities. The rope and the bailer currently in the well will be removed, if possible, prior to the well abandonment. The abandonment procedures will include grouting the entire length of the well casing and well screen with bentonite, removal of the upper two feet (minimum) of well casing, placement of a cement surface plug, and covering with clay material at the ground surface. The required well abandonment forms will be prepared and submitted to the IDNR, Division of Water. A report documenting the well abandonment will be prepared for submittal by the Dalton Corporation to the IDEM.

The proposed location for the replacement for well MW-12 is shown in the map in Attachment C. This location is in the general vicinity of well MW-12 and will provide a monitoring point for the north part of the Site. This location also is not in the wetland based on observations regarding surface topography, types of vegetation and the lack of standing water. It is expected that the area of waste placement in Phase 3 of the permitted landfill area will not extend north of the proposed location for the replacement for well MW-12.

The replacement well will be installed using a drill rig equipped with hollow-stem augers. Drilling equipment expected to contact subsurface soil will be steam cleaned prior to use at the Site. Soil samples will be collected with 1.5-foot long, split-spoon samplers every three (3) feet to approximately 40 feet below grade and then continuously thereafter until the completion depth of the boring. The boring will be conducted to a depth sufficient to install the replacement well in the same deep aquifer unit that is correlative with the aquifer that was screened by well MW-12. Continuous split-spoon sampling will be conducted above 40 feet if a significant (i.e. at least 18-inches thick) water bearing sand unit is encountered and until the base of the significant sand unit is defined. Split-spoon soil samplers will be decontaminated with a non-phosphate detergent wash and de-ionized water rinses prior to the collection of each soil sample. Each soil sample will be examined and classified by an EIS geologist in accordance with ASTM D-2488. A laboratory sieve analysis will be conducted on a representative sample the of aquifer material screened by the replacement well. Details regarding the drilling activities, including boring and soil-sampling methods, start-and-finish dates, depths of groundwater while drilling and upon completion, blow counts, sample intervals in feet, the amount of sample recovered and descriptions of subsurface soils encountered during the installation of the well, will be recorded on a Subsurface Exploration Log.

The well casing and screen of the replacement well will consist of threaded (no solvent glued connections), 2-inch diameter PVC. The screen for the well will consist of a five-foot section, PVC well screen with an appropriate slot size for the aquifer. Coarse, quartz sand pack will be placed in the annular space between the well screen and the bore-hole wall in the screened interval to

approximately 1.5 feet above the top of the screen. A 0.5-foot layer of fine silica sand pack will be placed in the annular space between the well casing and the bore-hole wall above the coarse, quartz sand pack. High-solid bentonite grout slurry will then be placed in the annular space between the well casing and the bore-hole wall above the sand pack to about three (3) feet below grade. The grout slurry will be placed from the bottom up using a tremie pipe. A metal protective cover with a locked lid to cover and secure the well casing riser above grade will be set in a concrete surface seal placed above the grout interval at the well. The well casing riser will be vented, and a drain hole will be installed in the protective cover for the well. The concrete surface seal will be constructed so as to deflect surface water away from the well. The well will be developed by the pump-and-surge method using a submersible pump or a bailer in order to remove fine sediment from the well and the sand pack in the screened area. The development will include the removal of at least three well casing volumes of water and will continue until the flow is as clear as possible. Protective steel posts, filled with and set in concrete, will be placed around the well so as to help protect the well from possible damaged by contact with mowing or other equipment. Details regarding the construction of the well will be recorded on a Monitoring Well Design Plan.

The location and elevation of the replacement well will be surveyed by a registered land surveyor. The surveyed elevation of a permanent reference point marked at the top of the well casing will be used as the reference point for measuring static water level elevations at the well. The well will be labeled (MW-12R) so that the well identification will readily visible in the field. A report documenting the well replacement will be prepared for submittal by the Dalton Corporation to the IDEM.

It is expected that implementation of the above plan will be conducted soon after the Dalton Corporation receives IDEM approval of the plan and before the next semi-annual monitoring event currently scheduled for August 2003. If there are any questions concerning the above plan, please call me or H. Stephen Nye, P.E., at (574) 277-5715.

Sincerely,

EIS ENVIRONMENTAL ENGINEERS, INC.

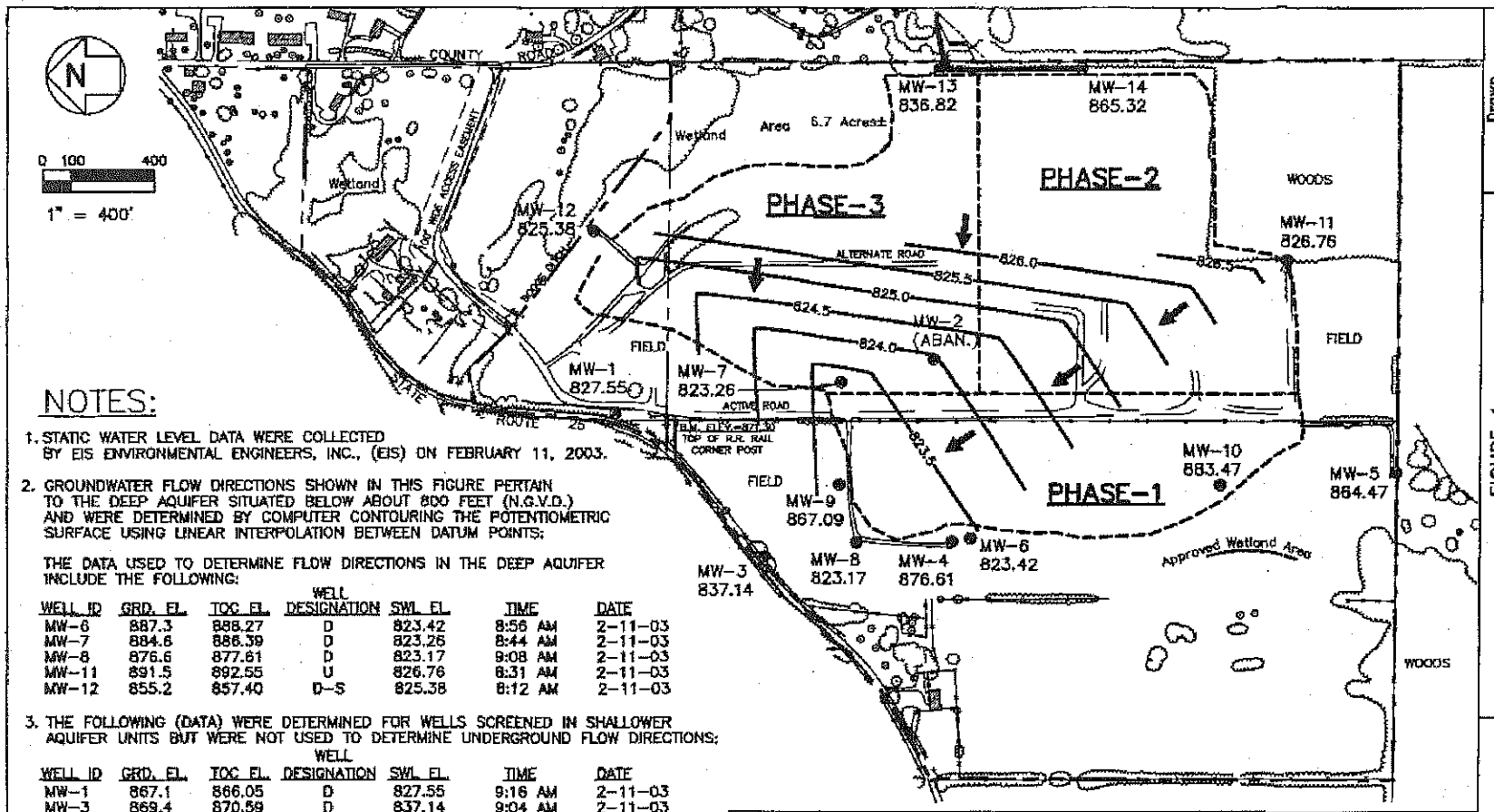
J. C. Sporleder, L.P.G.
Senior Project Geologist

JCS/bir

Attachments:
Attachment A: Groundwater flow direction maps.
Attachment B: Subsurface Exploration Logs and Monitoring Well Design Plans.
Attachment C: Map showing existing and proposed well locations.

ATTACHMENT A

GROUNDWATER FLOW DIRECTION MAPS



NOTES:

1. STATIC WATER LEVEL DATA WERE COLLECTED BY EIS ENVIRONMENTAL ENGINEERS, INC., (EIS) ON FEBRUARY 11, 2003.
2. GROUNDWATER FLOW DIRECTIONS SHOWN IN THIS FIGURE PERTAIN TO THE DEEP AQUIFER SITUATED BELOW ABOUT 800 FEET (N.G.V.D.) AND WERE DETERMINED BY COMPUTER CONTOURING THE POTENTIOMETRIC SURFACE USING LINEAR INTERPOLATION BETWEEN DATUM POINTS;

   THE DATA USED TO DETERMINE FLOW DIRECTIONS IN THE DEEP AQUIFER INCLUDE THE FOLLOWING:

WELL ID	GRD. EL.	TOC EL.	WELL DESIGNATION	SWL EL.	TIME	DATE
MW-6	887.3	886.27	D	823.42	8:56 AM	2-11-03
MW-7	884.6	886.39	D	823.26	8:44 AM	2-11-03
MW-8	876.6	877.61	D	823.17	9:08 AM	2-11-03
MW-11	891.5	892.55	U	826.76	8:31 AM	2-11-03
MW-12	855.2	857.40	D-S	825.38	8:12 AM	2-11-03

3. THE FOLLOWING (DATA) WERE DETERMINED FOR WELLS SCREENED IN SHALLOWER AQUIFER UNITS BUT WERE NOT USED TO DETERMINE UNDERGROUND FLOW DIRECTIONS:

WELL ID	GRD. EL.	TOC EL.	WELL DESIGNATION	SWL EL.	TIME	DATE
MW-1	867.1	866.05	D	827.55	9:16 AM	2-11-03
MW-3	869.4	870.59	D	837.14	9:04 AM	2-11-03
MW-4	888.7	889.58	D	876.61	9:00 AM	2-11-03
MW-5	887.6	888.97	U	864.47	8:27 AM	2-11-03
MW-9	872.1	872.51	D	867.09	8:52 AM	2-11-03
MW-10	890.1	892.87	D	883.47	8:21 AM	2-11-03
MW-13	888.79	891.03	D	836.82	7:49 AM	2-11-03
MW-14	894.94	897.17	D	865.32	7:55 AM	2-11-03

4. WELL DESIGNATIONS: U=UPGRADIENT, D=DOWN GRADIENT, S=SIDE GRADIENT. THE ASSUMED RELATIVE POSITIONS OF WELLS SCREENED IN THE SHALLOW AQUIFER AQUIFER NOT BEEN CONFIRMED, AND IT IS POSSIBLE THAT MORE THAN ONE SHALLOW AQUIFER IS PRESENT AT THE SITE. GRD.=GRADE, TOC=TOP OF CASING.
5. BASE MAP WAS PREPARED BY EIS USING SITE FEATURE AND WELL LOCATIONS PROVIDED IN SHEET 01 DALTON MONOFILL GRADES AND FILL THROUGH MARCH 07, 2001, DATED 08-13-01 BY PES ASSOCIATES, INC., OF WARSAW, INDIANA, FOR DALTON CORPORATION.
6. TOC ELEVATIONS PER PES SURVEY DATA DATED FEBRUARY 20, 1998, (FOR ALL BUT MW-12, MW-13 & MW-14); FEBRUARY 18, 2000 (FOR MW-12); AND AUGUST 6, 2002 (FOR MW-13 AND MW-14).

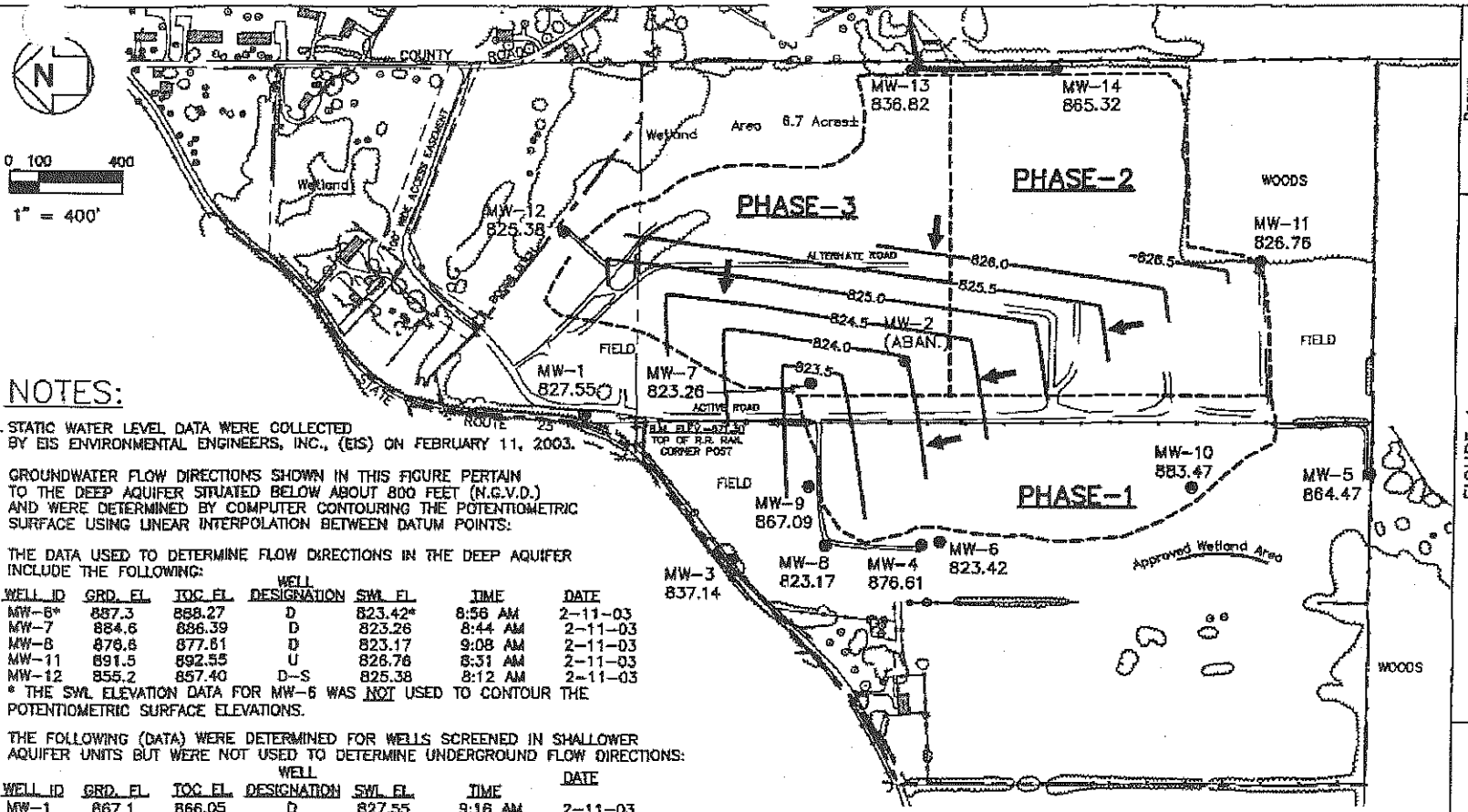
LEGEND

- MW-12 825.38 — MONITORING WELL WITH STATIC WATER LEVEL ELEVATION (N.G.V.D.) IN FEET.
- 827.0 — POTENTIOMETRIC SURFACE ELEVATION (N.G.V.D.) CONTOUR FOR DEEP CONFINED AQUIFER (TOP OF AQUIFER SITUATED BELOW AN ELEVATION OF ABOUT 800 FEET) PER STATIC WATER LEVEL DATA COLLECTED ON FEBRUARY 11, 2003. CONTOUR INTERVAL IS 0.5 FEET.
- GROUNDWATER FLOW DIRECTION FOR DEEP CONFINED AQUIFER PER STATIC WATER LEVEL COLLECTED FEBRUARY 11, 2003.
- FENCE. ROAD. TREES.
- PHASE 1 — PERMITTED LANDFILL CONSTRUCTION AREA.
- BUILDING. SITE BOUNDARY. EASEMENT.
- I — BENCH MARK ELEV. = 871.30 TOP OF R.R. RAIL CORNER POST.

Drawn JMS | Approved JCS | Date FEBRUARY 2003 | Proj.No. 1005-0301-01 | FIGURE 1

FIGURE 1
GOUNDWATER FLOW DIRECTION AND POTENTIOMETRIC SURFACE MAP FEBRUARY 11, 2003 STATIC WATER LEVEL DATA (CONTOURED WITH MW-6)
STATE ROUTE 25 MONOFILL SITE
DALTON CORPORATION
WARSAW, INDIANA

EIS ENVIRONMENTAL ENGINEERS, INC.
1701 North Ironwood Dr. • South Bend, IN 46635
Tele. (574) 277-5715 Fax. (574) 273-8693



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   THE DATA USED TO DETERMINE FLOW DIRECTIONS IN THE DEEP AQUIFER INCLUDE THE FOLLOWING:

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MW-12	855.2	857.40	D-S	825.38	8:12 AM	2-11-03

   * THE SWL ELEVATION DATA FOR MW-6 WAS NOT USED TO CONTOUR THE POTENTIOMETRIC SURFACE ELEVATIONS.

3. THE FOLLOWING (DATA) WERE DETERMINED FOR WELLS SCREENED IN SHALLOWER AQUIFER UNITS BUT WERE NOT USED TO DETERMINE UNDERGROUND FLOW DIRECTIONS:

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MW-9	872.1	872.51	D	867.09	8:52 AM	2-11-03
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- BENCH MARK ELEV. = 871.30 TOP OF R.R. RAIL CORNER POST.

FIGURE 1
GOUNDWATER FLOW DIRECTION AND POTENTIOMETRIC SURFACE MAP FEBRUARY 11, 2003 STATIC WATER LEVEL DATA (CONTOURED WITHOUT MW-6)
STATE ROUTE 25 MONOFILL SITE
DALTON CORPORATION
WARSAW, INDIANA

Drawn JMS | Approved JCS | Date FEBRAURY 2003 | Proj.No. 1005-0301-01 | FIGURE 1

EIS ENVIRONMENTAL ENGINEERS, INC.
1701 North Ironwood Dr. - South Bend, IN 46635
Tele. (574) 277-5715 Fax. (574) 273-8693

ATTACHMENT B

SUBSURFACE EXPLORATION LOGS AND MONITORING WELL DESIGN PLANS

EIS ENVIRONMENTAL ENGINEERS, INC.

SUBSURFACE EXPLORATION LOG

Boring No. MW-6
Sheet 1 of 1
Project No. 1005-05

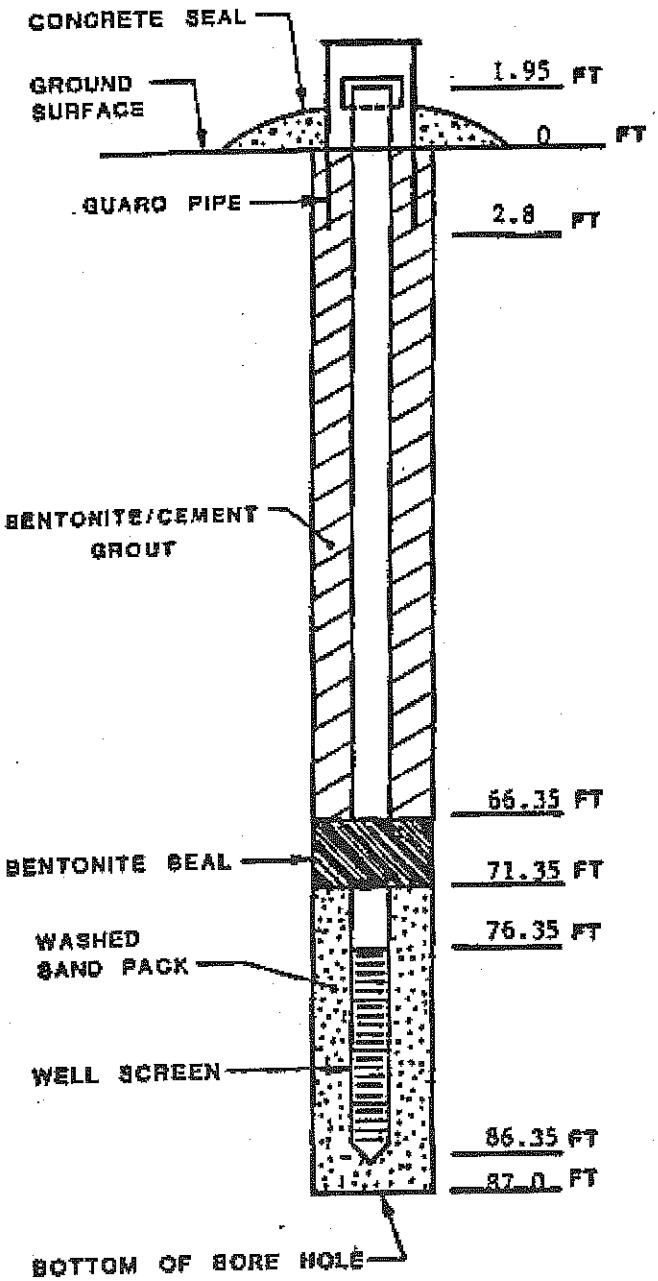
Client The Dalton Foundries, Inc.
Site Location Hwy 25 Site
Date Started 6-11-86
Date Completed 6-12-86
Boring Location MW #6 (See Site Plan)
Hammer Wt. 140 Lbs.
Boring Method 7" Hollow Stem Auger
Drop Distance 30"
Sampler Type Split-barrel
Sampler Size 1 1/2" x 18"
Datum NGVD 1929
Surface Elevation 890.13

GROUNDWATER DEPTH: While Drilling 80' Ft. At Completion ____ Ft.

After Completion ____ Hrs. ____ Ft; ____ Hrs. ____ Ft; ____ Hrs. ____ Ft; ____ Hrs. ____ Ft.

Soil Layer Limits From	To	Soil Description	Sample Data No.	From	To	% Rec.	Blows per 6"	Remarks
0.0	1.0	Dk brn sandy surface soil organic	1	60.0	61.5	100	50-100 -	
			2	70.0	71.5	100	60-90 -	
1.0	30.0	Med brn sandy silt wet tr. grav. at bottom	3	80.0	81.5	100	150 -	
30.0	41.0	Stiff gray silty clay tr. gravel	4	90.0	91.5	100	150 -	
41.0	42.5	Gray med fine sand						
42.5	80.3	Very stiff gray silty clay - tr. gravel						
80.3	91.5	Med coarse gray sand wet						
		TD 91.5'						

MONITORING WELL DESIGN PLAN



CLIENT: The Dalton Foundries, Inc.
Warsaw, IN

WELL NO: MW-6

TIME & DATE STARTED: 8:00 am 6-16-86

TIME & DATE COMPLETED: 6:30 pm 7-3-86

CASING MATERIAL: SCH 40 PVC

SCREEN MATERIAL: SCH 40 PVC
Slotted .010"

COMMENTS:

Surface Elev = 890.13

TOC Elev = 892.08

PROJECT NAME		PROJECT NO.	DATE
Hyw 25 Site	eis	1005-05	7-3-86

EIS ENVIRONMENTAL ENGINEERS, INC.

BORING: MW-12
Sheet 1 of 3
Project No: 3074-90

SUBSURFACE EXPLORATION LOG AND WELL DESIGN DIAGRAM

CLIENT Dalton Foundries, Inc. SITE LOCATION Hwy. 25 Site, Kersey, IN
LOGGED BY E.C. DATE STARTED 4-16-90 DATE COMPLETED 4-16-90

DEPTH-FEET SWL	SAMPLE	SAMP. NO.	% RECOVERED	BLOWS/6 IN	LITHOLOGY	SOIL CLASS Unified	SOIL DESCRIPTION
		1	33	1 1 1			GRAVELLY ROAD BASE
							TOPSOIL Silt 40%, Fine sand 30%, Clay 30%, moderate brown, moist.
5		2	100	1 0 1			PEAT Peat, organic rich, wood chips, rootlets, very soft, wet, organic odor, moderate yellow brown to dusky brown.
		3	100	1 0 0			
10		4	100	1 0 0			
		5	100	0 0 0			
15		6	100	0 0 0			MARL Marl, rare rootlets, organic rich, poorly compacted, clayey texture, dark grey.
		7	67	0			
0							

WELL DIAGRAM
Cement/Bentonite Grout

METHOD OF DRILLING Hollow Stem Auger
SAMPLE METHOD Split Spoon
SURFACE ELEVATION 855.17 feet NGVD
COMPLETION DEPTH 50.0 feet
SWL DURING BORING 27.00 feet

WELL DIAMETER 2.0 inches
WELL MATERIAL PVC
PACKING MATERIAL Formation Sand
WELL DEVELOPMENT GED Sample Pro
SWL AT COMPLETION 29.62 feet

eis

EIS ENVIRONMENTAL ENGINEERS, INC.

BORING: MW-1
Sheet 2 of
Project No: 3074-9

SUBSURFACE EXPLORATION LOG AND WELL DESIGN DIAGRAM

CLIENT Dalton Foundries, Inc. SITE LOCATION Hwy. 25 Site, Warsaw, IN

DEPTH-FEET SWL	SAMPLE	SAMP. NO.	% RECOVERED	BLOWS/6 IN	LITHOLOGY	SOIL CLASS Unified	SOIL DESCRIPTION	WELL DIAGRAM
				0 0				Cement/Bentonite Grout
		8	0	1 0 0				
25		9	100	1 4 3			SILTY SANDY CLAYEY MARL Marl, Fine sand 33%, Silt 33%, Clay 33%, poorly compacted, poorly sorted, wet, dark gray.	
							FINE SAND Fine sand 80%, Silt 20%, poorly sorted, poorly compacted, medium grey.	
30		10	67	5 6 7			CLAYEY SILTY SAND Fine sand 40%, Silt 40%, Clay 20%, moderate compaction, poorly sorted, olive grey.	
		11	100	3 2 3		SC-SM	CLAYEY SILTY SAND Fine sand 30-40%, Silt 30-40%, Clay 20%, well compacted, trace of fine gravel, poorly sorted, poorly compacted fine sand seam 32.7-33.5, olive grey.	
35		12	100	7 4 7				
		13	100	5 7 11				
40								

EIS ENVIRONMENTAL ENGINEERS, INC.

BORING: MW-12
Sheet 3 of 3
Project No: 3074-90

SUBSURFACE EXPLORATION LOG AND WELL DESIGN DIAGRAM

CLIENT Dalton Foundries, Inc. SITE LOCATION Hwy. 25 Site, Warsaw, IN

DEPTH-FEET MSL	SAMPLE	SAMP. NO.	% RECOVERED	BLOWS/6 IN	LITHOLOGY	SOIL CLASS Unified	SOIL DESCRIPTION
		14	100	2 4 3		SW	**FINE TO MEDIUM SAND** Medium sand 60%, Fine sand 20%, Coarse sand 10%, Fine gravel 10%, poorly sorted, poorly compacted, wet, olive grey.
		15	100	5 9 12		SC-SM	**CLAYEY SILTY SAND** Fine sand 30-40%, Clay 30%, Silt 30%, well compacted, poorly sorted, well sorted fine sand seam present 53-54', olive gray.
45		16	100	6 12 19			
		17	100	9 11 15			
50		18	100	5 7 8			
		19	100	4 7 10		SW	**FINE TO MEDIUM GRAVELLY SAND** Medium sand 50%, Fine sand 20%, Coarse sand 20%, Fine gravel 10%, poorly sorted, poorly compacted, deep aquifer, olive gray. End of boring 60.0. Screen for monitoring well set 55-60'. Drilling contractor: Cook Drilling Co..
55		20	100	15 22 35			
60							

WELL DIAGRAM

Cement/Bentonite Grout

Formation Sand Pack

10 Slotted .010 PVC Screen

ATTACHMENT C

MAP SHOWING EXISTING AND PROPOSED WELL LOCATIONS

2C1C
Dalton Foundry
RWS II
State Rd 25

DALTON

Dalton Corporation

Kosciusko County

May 6, 2003

CERTIFIED MAIL NO. 7001 2510 0003 0933 2080

Mr. John Hale
Permits Branch
Office of Land Quality
Indiana Department of Environmental Management
100 N. Senate Avenue, N1154
P.O. Box 6015
Indianapolis, Indiana 46206-6015

RE: **Groundwater Monitoring Report / February 2003 Sampling Event / Notification of Increase Above a Groundwater Protection Standard and Demonstration that a Source Other than the Facility Solid Waste Facility Caused the Increase / Dalton Corporation, State Road 25 Monofill Site / Permit FP# 43-06**

Dear Mr. Hale:

Transmitted herewith, on behalf of the Dalton Corporation, Warsaw Manufacturing Facility, of Warsaw, Indiana, is the report regarding groundwater monitoring conducted on February 11 and 12, 2003, at the Dalton Corporation, State Road 25 monofill site (Solid Waste Facility Permit FP# 43-06), located southwest of Warsaw, Indiana. The subject analyses, evaluations and reporting were conducted in accordance with the requirements of the permit dated February 11, 2002, from the Indiana Department of Environmental Management (IDEM). The groundwater monitoring and report preparation were conducted by EIS Environmental Engineers, Inc., (EIS) of South Bend, Indiana, on behalf of the Dalton Corporation.

The February 2003 sampling event was the first of two semi-annual sampling events planned during 2003 for monitoring wells MW-1, MW-3, MW-4, MW-5, MW-7, MW-8, MW-11, MW-12, MW-13 and MW-14. The February 2003 sampling event also was the third of eight planned quarterly sampling events to obtain quarterly baseline data for the two new monitoring wells MW-13 and MW-14 installed at the Site during 2002. However, monitoring well MW-13 could not be sampled during

Warsaw Manufacturing Facility
P.O. Box 1388
Warsaw, IN 46581-1388
(219) 267-8111

DALTON

February 2003 because the well was found to be dry. To date, the available quarterly baseline data are insufficient to conduct statistical evaluations of the data from wells MW-13 and MW-14. Therefore, this report does not include statistical evaluations to determine if concentrations are above a groundwater protection standard or if increasing concentration trends are indicated for the parameters tested for samples from wells MW-13 and MW-14. In accordance with permit requirements E-10, E-11 and E-14, this submittal includes two (2) unbound copies of the report with a diskette containing an electronic version of the subject monitoring data in the format specified by the IDEM.

I am a duly authorized representative of the Dalton Corporation (the permittee) and, as required by the facility permit condition B4 and 329 IAC 10-11-3(b), I make the following certification regarding the subject report:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons who managed the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. I further certify that I am authorized to submit this information.

Please feel free to call me at (574) 372-1804 if there are any questions regarding the subject report.

Sincerely,

DALTON CORPORATION

Michael Schall

Michael Schall
Environmental Manager

(27)

FCR Dekalb Co

AUGUST MACK ENVIRONMENTAL INC

8007 CASTLETON ROAD
INDIANAPOLIS, IN 46250
TEL: (317) 579-7400 FAX: (317) 579-7410

January 8, 1999

RECEIVED
JAN 11 1999
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
SOLID & HAZARDOUS WASTE MANAGEMENT

Victor P. Windle, Chief
Hazardous Waste Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management
Indiana Department of Environmental Management
100 North Senate Avenue
Post Office Box 6015
Indianapolis, Indiana 46206-6015

COPY

Re: Request for Modification to the
Existing Detection Monitoring Program
Dalton Corporation
Warsaw Manufacturing Facility
IND 005146022
August Mack Project No. 98025.30

Dear Mr. Windle:

August Mack Environmental, Inc. (August Mack) has prepared this submittal, on behalf of Dalton Corporation - Warsaw Manufacturing Facility (Dalton), to request modifications to the Detection Monitoring Plan (DMP) currently being followed by Dalton for closure of former RCRA regulated units. Dalton is in the third year of a five year groundwater detection monitoring program as outlined in the DMP submitted to the Indiana Department of Environmental Management (IDEM) on December 9, 1994. Data generated during the first three years of detection monitoring has necessitated the need for this modification request. As summarized in Appendix I of 40 CFR 270.42 - Classification of Permit Modification, the following modifications and their associated class are requested.

Citation	Modification	Class
40 CFR 270.42, Appendix I (C)(5)(b)	Changes in indicator parameters, hazardous constituents, or concentration limits (including alternative concentration limit (ACLs)): (b) as specified in the detection monitoring plan.	2
40 CFR 270.42, Appendix I(C)(3)	Changes in statistical procedure for determining whether a statistically significant change in groundwater quality between upgradient and downgradient wells has occurred.	1

Each of these modifications is discussed individually below.

Class 2 Modification

Dalton requests this Class 2 Modification as described in 40 CFR 270.42 (b) to remove barium from the detection monitoring parameter list. The Detection Monitoring Parameters Section of the DMP (Page 26) stated that "*...the contaminants of concern and the detection monitoring parameters are lead and cadmium. Field measurements of pH, specific conductance and temperature will also be obtained as in-situ parameters...*". During closure of the regulated units, groundwater samples were collected from the compliance and background wells for the DMP parameters (lead and cadmium) along with the chemical constituents contained in 40 CFR 264, Appendix IX. Since barium and vanadium (Appendix IX constituents) were detected, the IDEM requested that Dalton add these Appendix IX constituents to the detection monitoring parameter list.

It has been shown during the first three years of detection monitoring that statistical analysis of barium concentrations at the site is skewed due to the occurrence of barium in natural groundwater throughout Kosciusko County. For example, barium concentrations in groundwater collected at the site during the previous seven sampling event has ranged from 0.10 to 0.38 parts per million (ppm). For comparison purposes, United State Geological Survey (USGS) Water-Resources Investigation Report 95-4244, dated June 1993, showed barium was detected in groundwater collected from 128 northwestern Indiana wells at concentrations ranging from 0.005 to 0.690 ppm. In addition, data provided by the IDEM Drinking Water Section, shows that barium concentrations collected from 1993 through 1997 in Kosciusko County ranged from 0.00002 ppm to 0.67 ppm. The data for these sources is provided as Attachment A. This information indicates that barium is found as a naturally occurring element in nearby groundwater at concentrations comparable to and is some cases greater than those detected at the site. However, it should be noted that both the county and site barium concentrations are well below the 2.0 ppm maximum contaminant level (MCL) for barium.

As part of this modification, Dalton will continue to sample for barium during the remainder of the detection monitoring period and report the findings to the IDEM. However, Dalton will compare the detected barium concentrations to the maximum concentration limit for barium (1.0 ppm) specified in Table 1 of 40 CFR 264, Subpart F to verify compliance under the detection monitoring program instead of performing statistical analysis to determine if the barium concentrations are statistically significant.

Since this is a Class 2 modification, Dalton will publish a notice of the modification in accordance with 40 CFR 270.42 (2) and conduct a public meeting in accordance with 40 CFR 270.42 (4). Documentation of these notifications will be provided to the IDEM upon preparation.

Class 1 Modification

As outlined within the Data Presentation and Analysis Section of the DMP (Page 40), groundwater data is to be evaluated statistically using Cochran's Approximation to the Behrens-Fisher Students T-Test. Dalton requests a Class 1 Modification to the DMP as described in 40 CFR 270.42 (1) by replacing the Cochran's Approximation to the Behrens-Fisher Students T-Test with the Test of Proportions in the DMP for vanadium, cadmium and lead. It has been shown during the first three years of detection monitoring that the Test of Proportions is a more suitable statistical method for analyzing groundwater data from the Dalton wells due to the natural variation of these metals in Kosciusko County groundwater. According to a US EPA Document entitled *Analysis of Groundwater Monitoring Data at RCRA Facilities*, dated April 1989, the Test of Proportions is used to determine whether a difference in proportion of detected values in the background well and compliance wells provides statistically significant evidence of contamination. Based on this information, it is believed that the Test of Proportions complies with the performance standards summarized in 40 CFR 264.98 (I). If this modified statistical comparison indicates a significant difference between the compliance and background well data, the sampling and comparison procedures will be repeated. If the second comparison reveals a significant difference, Dalton will either initiate another appropriate statistical test with the approval of the IDEM, or Dalton will conclude that a statistically significant change has occurred.

During the review process for these proposed modifications, Dalton will continue to proceed with the detection monitoring program. Written documentation of any information obtained during the modification approval process will be submitted to the IDEM so it may be included in the closure file. We trust that this submittal meets with your approval. If you have any questions or require any additional information, please do not hesitate to contact us.

Sincerely,

Kent Johnson
Project Environmental Scientist

John D. Spearin
Senior Geologist

cc: Mr. Barry Fordanish - Dalton Corporation - Warsaw Manufacturing Facility
Ms. Lisa McCoy - Dutton & Overman
Ms. Cheryl Frischkorn - IDEM
Ms. Michelle Timmerman - IDEM

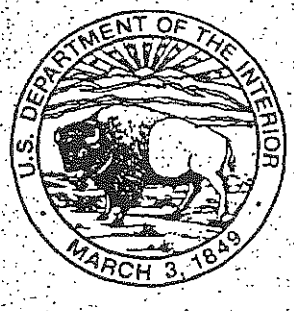
Attachment A

Regional Groundwater Barium Data

GROUND-WATER QUALITY IN THE CALUMET REGION OF NORTHWESTERN INDIANA AND NORTHEASTERN ILLINOIS, JUNE 1993

U.S. GEOLOGICAL SURVEY

Water-Resources Investigations Report 95-4244



Prepared in cooperation with the

U.S. ENVIRONMENTAL PROTECTION AGENCY

Aluminum

Aluminum was detected in 54 water samples: 36 from wells completed in the Calumet aquifer, 14 from wells in the confining unit, and 4 from wells in the Silurian-Devonian aquifer. Aluminum was not detected in any of the samples from confined sand aquifers. Detected concentrations of aluminum ranged from 21.3 µg/L for wells BH28 (S-071) and C3 (S-104) to 7,280 µg/L for well I20 (S-119). Small concentrations, less than 50 µg/L, were detected in samples from wells throughout the study area. The largest concentrations of aluminum, more than 500 µg/L, were detected in samples from several wells near and south of Lake Calumet and Wolf Lake and at well B2 (S-048) along the Lake Michigan shoreline in the central part of the study area. Aluminum concentrations ranging from 50 to 500 µg/L were detected in samples from other wells near Lake Calumet and Wolf Lake, from three wells in the central part of the study area, and from five wells in the eastern part of the study area. The SMCL for aluminum, 50 µg/L, (table 19) was exceeded in 29 water samples: 18 from wells in the Calumet aquifer, 8 from wells in the confining unit, and 3 from wells in the Silurian-Devonian aquifer.

Antimony

Antimony was detected in samples from wells B7 (S-069) and D67 (S-072), at concentrations of approximately 20 µg/L. These wells are completed in the Calumet aquifer and are approximately 4.5 mi apart on the south side of the Grand Calumet River in the central part of the study area (fig. 2). Both wells are less than 11 ft deep and are paired with adjacent deep wells that produced samples in which antimony was not detected. The detected concentrations exceeded the proposed MCL of 5 µg/L; however, because the laboratory quantitation limit for antimony is also larger than 5 µg/L, it is not known if concentrations in other samples may have exceeded the proposed MCL (table 19).

Arsenic

Arsenic was detected in samples from 69 wells: 48 completed in the Calumet aquifer, 14 in the confining unit, 4 in confined sand aquifers, and 3 in the Silurian-Devonian aquifer. Detected concentrations ranged from 1.7 µg/L in water from well E6 (S-024) to 292 µg/L in water from well I15 (S-051). Concentrations in 14 of the samples were between the two quantitation limits, 1.7 and 2.7 µg/L, reported by the laboratory. Arsenic was detected in samples from wells throughout the study area; however, two-thirds of these samples were from wells located in industrial and commercial areas between the Indiana Harbor Canal and the area west of Lake Calumet. The three largest concentrations, 73, 127, and 292 µg/L, were detected in samples from wells I16 (S-059), I14 (S-035), and I15 (S-051), all of which are between Lake Calumet and the Calumet River (fig. 2). These wells are less than 15 ft deep and are completed in the Calumet aquifer in an area of fill and near waste disposal. Arsenic concentrations in these samples exceeded the proposed MCL for arsenic (table 19).

Comparison of arsenic concentrations at 14 sites where there are paired wells indicates no consistent trend with depth except at 3 sites in the eastern part of the study area where wells are screened in confined sand aquifers. Samples from wells 230-128 (S-010), 244-125 (S-052), and 105 (S-083) contained arsenic concentrations larger than 10 µg/L. Arsenic was not detected in any samples from the shallow wells at these sites. The sample from well 230-58 (S-003), an intermediate-depth well, contained an arsenic concentration between those of the shallow well and deep well at that site. The detection of arsenic in the confined sand aquifer may indicate upward flow from the underlying shale bedrock in this area.

Barium

Barium was detected in samples from all wells except FILO6 (S-128), a 19-ft-deep well completed in the confining unit. Detected concentrations ranged from 5 µg/L in water from well B7 (S-069) to 690 µg/L in water from well I1 (S-032).

Samples from wells screened in the confining unit generally had larger concentrations of barium than did samples from wells in the Calumet, confined sand, or Silurian-Devonian aquifers. The median detected concentration was 105 µg/L for samples from wells completed in the confining unit, 73.3 µg/L for samples from wells in confined sand aquifers, 56.6 µg/L for samples from wells in the Calumet aquifer, and 24.1 µg/L for samples from wells in the Silurian-Devonian aquifer. The MCL for barium, 2,000 µg/L, was not exceeded in any samples (table 19); only two wells, I1 (S-032) and B2 (S-048), produced samples containing concentrations of barium larger than 500 µg/L, or 25 percent of the MCL. Well I1 is in an area of modified land near waste treatment and disposal south of Lake Calumet. Well B2 is in an industrial area along Lake Michigan in the central part of the study area (fig. 2).

Beryllium

Beryllium was detected in samples from wells 235-45 (S-041) and I20 (S-119). The sample from well 235-45 contained 0.77 µg/L; the sample from well I20 contained 1.5 µg/L. The detected concentrations are similar to the two quantitation limits (0.5 and 1.2 µg/L) reported by the laboratory (table 19). Well 235-45 is screened in the Calumet aquifer at a depth of 42 feet and is in a residential area in the east-central part of the study area. Well I20 is screened in the Calumet aquifer at a depth of 15 ft in an area west of the Calumet River that may be affected by local dumping. The concentration of beryllium detected in the sample from I20 exceeded the proposed MCL of 1 µg/L (table 19). It is not known if other samples may have exceeded the proposed MCL because the quantitation limit was larger than the MCL for some of the samples.

Cadmium

Cadmium was detected in the sample from well BH14 (S-094) at a concentration of 2 µg/L. Well BH14 is screened at a depth of 19 ft in the Calumet aquifer and is in a residential area in the central part of the study area (fig. 2). The detected concentration of cadmium does not exceed the MCL (table 19).

Chromium

Chromium was detected in samples from 11 wells: 5 are completed in the Calumet aquifer and 6 are in the confining unit. Chromium was not detected in any samples from the confined sand or Silurian-Devonian aquifers. Detected concentrations ranged from 5.2 µg/L in water from well C25 (S-075) to 116 µg/L in water from well BH7I (S-061). The smallest detected concentration, 5.2 µg/L, is within the range of the two quantitation limits (5.1 and 5.8 µg/L) reported by the laboratory (table 19). The majority of chromium detections were in samples from wells in industrial areas or near areas of fill or waste disposal; however, samples from wells BH2 (S-092) and D75 (S-116), located in residential areas, had chromium concentrations of 9.7 and 11 µg/L. The MCL for chromium was exceeded in only one sample (table 19).

Cobalt

Cobalt was detected in 14 samples: 6 from wells completed in the Calumet aquifer, 7 from wells in the confining unit, and 1 from a well in the Silurian-Devonian aquifer. All the wells are west of the Indiana Harbor Canal. All but three of the wells are near Lake Calumet. Six of the detected concentrations were between the two quantitation limits reported by the laboratory for cobalt (2.5 and 3.8 µg/L). The largest concentration, 51.2 µg/L, was detected in the sample from well FILO2 (S-127), a 29-ft-deep well screened in the confining unit near an area of waste disposal. The smallest detected concentration was 2.8 µg/L in the samples from well D75 (S-116) located in a residential area south of the Grand Calumet River in the west-central part of the study area (fig. 2).

Query2 5/15/97

RESULT (mg/l)	DATE COLLECTED
0.14	10/24/94
0.094	7/13/93
0.08	8/31/93
0.15	10/7/94
0.43	12/8/94
0.24	9/30/93
0.24	11/29/94
0.24	9/14/93
0.31	10/24/94
0.01	11/29/94
0.23	10/19/94
0.29	1/17/94
0.36	12/28/93
0.24	8/11/93
0.1	10/25/94
0.00002	9/28/95
0.2	11/29/94
0.05	7/27/93
0.17	11/16/94
0.014	12/8/94
0.17	12/14/94
0.1	11/1/94
0.11	8/18/93
0.33	8/16/93
0.15	3/29/93
0.19	12/7/94
0.2	8/31/93
0.36	7/27/93
0.031	7/26/93
0.2	3/18/93
0.15	2/9/93
0.08	3/26/93
0.6	12/16/94
0.29	12/9/94
0.1	12/1/93
0.52	12/13/94
0.24	10/17/94
0.01	9/30/93
0.32	2/24/93
0.61	12/9/94
0.14	9/30/93
0.24	8/6/93
0.25	12/12/94
0.1	12/1/93
0.013	3/2/94
0.082	8/31/93
0.13	12/6/94
0.52	10/10/94
0.23	12/5/94
0.12	12/8/94
0.11	12/9/94
0.01	11/1/94
0.01	10/17/94
0.26	10/19/94
0.16	10/11/94
0.32	7/27/93
0.67	12/15/94
0.24	9/16/93
0.21	8/31/93
0.29	3/26/93

Post-it® Fax Note 7671	Date 5/15/97	# of pages ▶ 3
To Steven Zins	From TONY AKLS	
Co./Dept.	Co.	
Phone #	Phone #	
Fax # (317) 579-7410	Fax #	

Steven,

All results are mg/l (ppm). Also, these are all the results for Kosciusko County. The column "Date Collected" is the day the water sample was taken.

Tony

Query2 5/15/97

RESULT (mg/l)	DATE COLLECTED
0.13	11/21/94
0.14	11/10/94
0.01	8/2/93
0.36	8/2/93
0.05	3/15/94
0.098	10/31/94
0.32	8/2/93
0.16	10/31/94
0.25	8/12/93
0.01	8/9/93
0.34	8/9/93
0.04	2/6/95
0.27	8/9/93
0.41	9/23/93
0.19	9/23/93
0.43	3/26/93
0.34	8/12/93
0.31	3/16/95

Query2 5/15/97

RESULT (	DATE COLLECTED
0.16	3/19/96
0.07	2/27/96
0.27	2/27/96
0.36	5/20/96
0.16	3/20/96
0.08	3/22/96
0.17	2/28/96
0	4/1/96
0.012	7/23/96
0.12	7/10/96
0.34	7/30/96
0.1	6/28/96
0.33	7/28/96
0.1	12/4/96
0.1	12/4/96
0.015	12/2/96
0.23	9/6/96
0.063	9/6/96
0.13	9/24/96
0.31	9/19/96
0	9/18/96
0.54	9/17/96
0.14	9/17/96
0.13	8/14/96
0.06	6/21/96
0	6/27/96
0	3/10/97

(28)

Ft Dekalb Co.

AUGUST MACK ENVIRONMENTAL INC

8007 CASTLETON ROAD
INDIANAPOLIS, IN 46250
TEL: (317) 579-7400 FAX: (317) 579-7410

January 25, 1999

Victor P. Windle, Chief
Hazardous Waste Management Branch
Solid and Hazardous Waste Management
Indiana Department of Environmental Management
100 North Senate Avenue
Post Office Box 6015
Indianapolis, Indiana 46206-6015

Re: Public Notice Proof of Publication
Class 2 Modification Request
Dalton Corporation
Warsaw Manufacturing Facility
IND 005146022

Dear Mr. Windle:

On January 8, 1999, August Mack Environmental, Inc. (August Mack) submitted a request to your office on behalf of Dalton Corporation-Warsaw Manufacturing Facility (Dalton) for a Class 1 and Class 2 detection monitoring plan modification. The following public notice for the Class 2 modification request appeared in the January 19, 1999 issue of the Warsaw Times Union:

Dalton Corporation-Warsaw Manufacturing Facility has requested a Class 2 detection monitoring plan modification from the Indiana Department of Environmental Management (IDEM) regarding testing requirements for barium during the remaining 3 years of a groundwater detection monitoring program. The monitoring is being conducted as part post-closure requirements for surface impoundments closed at Dalton in 1996. This notice initiates a 60-day public comment period. Comments can be forwarded to Ms. Michelle Timmerman of the IDEM at 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015 (317-232-3264). A public meeting regarding this request will be held in the Shriners Building at the Fairgrounds on February 24, 1999 at 6:00 p.m.

Attached is a copy of the Proof of Publication from the Warsaw Times Union. We trust that this submittal meets with your approval. If you have any questions or require any additional information, please do not hesitate to contact us.

Sincerely,

Kent Johnson
Project Environmental Scientist

John D. Spearin
Senior Geologist

cc: Mr. Barry Fordanish - Dalton Corporation - Warsaw Manufacturing Facility
Ms. Lisa McCoy - Dutton & Overman
Ms. Michelle Timmerman - IDEM

Affidavit

Kosciusko County)
State of Indiana) SS:

Personally appeared before me, a notary public in and for said county and state, the undersigned Dona J. Kinsey, who being duly sworn says that she is of competent age and is comptroller of the

WARSAW TIMES-UNION

a daily newspaper which for at least five (5) consecutive years has been published in the city of Warsaw, county of Kosciusko, State of Indiana, and which, during that time, has been a newspaper of general circulation, having a bona fide paid circulation, printed in the English language and entered, authorized and accepted by the post-office department of the United States of America as mailable matter of the second-class as defined by the Act of Congress of the United States of March 3, 1879, and that the printed matter attached hereto is a true copy, which was duly published in said newspaper 1 times, the dates of publication being as follows:

Jan. 19

Dona J. Kinsey
Affiant

Subscribed and sworn to before me this 19 day of Jan, 19 99

Notary Public

DENNIS PLUMMER.
My Commission Expires Jan. 25, 1999.
Resident of Kosciusko County.

Printer's Fee, $ 30.-

PUBLIC NOTICE

Dalton Corporation-Warsaw manufacturing Facility has requested a Class 2 detection monitoring plan modification from the Indiana Department of Environmental Management (IDEM) regarding testing requirements for barium during the remaining 3 years of a 5 groundwater detection monitoring program. The monitoring is being conducted as part post-closure requirements for surface impoundments closed at Dalton in 1996. This notice initiates a 60-day public comment period. Comments can be forwarded to Ms. Michelle Timmerman of the IDEM at 100 North Senate Avenue, P.O. box 6015, Indianapolis, Indiana 46206-6015 (317-232-3264). A public meeting regarding this request will be held in the Shriners Building at the Fairgrounds on February 24, 1999 at 6:00 p.m.

J19

(29)

files

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Frank O'Bannon
Governor

John M. Hamilton
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.ai.org/idem

VIA CERTIFIED MAIL P 126 003 956

February 19, 1999

Mr. Barry Fordanish
Dalton Corporation
Warsaw Manufacturing Facility
P.O. Box 1388
Warsaw, Indiana 46581-1388

Dear Mr. Fordanish:

Re: Closure Plan Amendment
Dalton Foundry
Warsaw, Indiana
IND 005146022

The Indiana Department of Environmental Management (IDEM) acknowledges receipt of a closure plan amendment request, submitted on your behalf by August Mack Environmental, dated January 8, 1999. The amendment request has been reviewed and approved with the following modification.

> If barium is detected in a monitoring well above the value found in Table 1 of 40 CFR 264 (1.0 ppm), the same criteria for action as stated in the first paragraph of page 44 of the Detection Monitoring Plan, dated August 25, 1995 will apply (e.g., if the detected value is above the Table 1 value, Dalton will repeat the sampling and comparison procedures, etc.)

The amendment request as modified supersedes the requirements of the closure plan approved February 26, 1996. If you wish to challenge this decision, IC 13-15-6-1 and IC 4-21.5-3-7 require that you file a Petition for Administrative Review.

If you have any questions regarding this matter, please call (800) 451-6027, press 0, and ask for Michelle Timmermann at extension 2-3264, or call 317/232-2364.

Sincerely,

Victor P. Windle

Victor P. Windle, Chief
Hazardous Waste Permit Section
Hazardous Waste Facilities Branch
Solid and Hazardous Waste Management

cc: DeKalb County Health Department
Ms. Cheryl Frischkorn, IDEM
Mr. Craig Barker, IDEM

(35)

Public file

AUGUST MACK ENVIRONMENTAL INC.
8007 CASTLETON ROAD
INDIANAPOLIS, INDIANA 46250
(317) 579-7400
(317) 579-7410 FAX

COPY

November 9, 2001

RECEIVED

NOV 15 2001

DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
OFFICE OF LAND QUALITY

Mr. Victor P. Windle, Chief
Indiana Department of Environmental Management
Office of Land Quality
Hazardous Waste Permit Section
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015

Re: Response to Request for Additional Information
Dalton Corporation
Warsaw Manufacturing Facility
Closure of Surface Impoundments
IND 005146022
August Mack Project Number 98025.30

Dear Mr. Windel:

August Mack Environmental, Inc. (August Mack), on behalf of Dalton Corporation Warsaw Manufacturing Facility (Dalton), is submitting four copies of Dalton's response to the Indiana Department of Environmental Management (IDEM) Hazardous Waste Permit Section request for additional information dated October 17, 2001 for Dalton's RCRA pond closure. IDEM's comments are presented in bold below, followed by Dalton's response.

Comment #1

Page 3 of the Closure Plan amendment, approved on February 19, 1999, requested to replace the Cochran's Approximation to the Begren's Fisher Student's T-test with the Test of Proportions. This amendment was approved on February 19, 1999, yet data for both sampling events in 1999 were evaluated using the Wilcoxon Rank-Sum test, instead of the Test of Proportions.

Data for both sampling events in 2000 and for the April 2001 sampling event were evaluated using the ANOVA and Bonferroni tests. Though the approved 1999 amendment states that other tests than the Test of Proportions will be implemented with approval from IDEM, approval for the ANOVA or the Rank-Sum test was not requested or granted.

Please submit documentation to correct this oversight.

Response #1
August Mack analyzed both sets of 1999 groundwater sampling data using the Wilcoxon Rank-Sum statistical method and the subsequent sampling events through April 2001 using ANOVA and Bonferroni tests. At the time of report submittal of each of these sampling events, August Mack explained the reasoning for use of these statistical methods and asked IDEMs approval for continued use of these statistical methods. August Mack assumed that since there was no response from IDEM, the statistical methods used were acceptable. Therefore, August Mack is again requesting written approval from the IDEM for the use of the ANOVA, Rank-Sum test and Bonferroni statistical tests used to analyze the ground water quality data collected during previous sampling events.

Comment #2
According to the semi-annual ground water sampling reports, no statistically significant increases were found. However, IDEM's evaluation of the same data using the approved Test of Proportions found that there is a statistically significant difference between the background well and the downgradient wells for vanadium. Statistically significant increases were confirmed for vanadium in all three downgradient wells, by using parametric and non-parametric ANOVA, prediction limit and tolerance limit tests. Specifically, it appears Dalton missed detecting statistically significant increases for vanadium in monitoring wells MW-2, MW-3, and MW-4 for the November 2000 event.

In order to qualify for clean closure certification, Dalton must demonstrate that the increase was not attributable to the Wastewater Ponds and Sludge Drying Areas. Alternatively, Dalton may demonstrate that any hazardous constituents remaining in the ground water do not pose a threat to human health or the environment.

Response #2
IDEM has found significant increases for vanadium in monitoring wells MW-2, MW-3 and MW-4 for the November 2000 event. Concentrations for the three wells are 0.041 parts per million (ppm), 0.040 ppm, and 0.037ppm respectively. August Mack cannot explain this increase in vanadium concentrations since Dalton does not generate waste that contains vanadium. Regardless, August Mack believes these concentrations are still statistically insignificant. The detected November 2000 vanadium concentrations are still significantly less than the 0.2128 ppm Tier II cleanup level for residential groundwater and the RCRA Region 9 preliminary remediation goal (PRG) of 0.26 ppm for tap water. These concentrations are approximately 81% less than the Tier II 0.2128 ppm requirement for residential drinking water. Due to the insignificant concentrations of vanadium in the groundwater as compared to the Tier II residential groundwater standards at the site, August Mack is requesting that IDEM approve the RCRA pond clean closure at the Dalton facility.

Dalton trusts that the provided response to comments will complete the RCRA pond closure. A certification statement concerning the additional information provided in this submittal has been attached and is signed by Mr. Timothy H. Dewitt, a state of Indiana licensed professional engineer. If you have any questions regarding the above responses, please do not hesitate to call us at (317) 579-7400.

Sincerely,

Eric Emmett
Staff Engineer

Timothy H. Dewitt P.E.
Senior Engineer

Attachments

cc: Ms. Lisa McCoy, Dalton Corporation
Mr. Boyd Wear, Dalton Corporation Warsaw Manufacturing Facility

ATTACHMENT A

Engineer Certification

IX. ENGINEER CERTIFICATION

I certify under penalty of law that this document* and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on by inquiry of the persons who managed the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. I further certify that I am authorized to submit this information.

Signature: T H Dewitt Date: 11/9/01

Name: Timothy H. Dewitt

Address: 8007 Castleton Road

Indianapolis, Indiana 46250

Telephone No.: (317) 579-7400

Professional Engineer Registration No. 10100295

* Response to Dalton Foundries Closure of Surface Impoundments

(36)

INDIANA D. ARTMENT OF ENVIRONMENTAL MANAGEMENT

SOLID WASTE LAND DISPOSAL FACILITY PERMIT RENEWAL APPLICATION SWF-5

Dalton Corp. - Warsaw Kosciusko Co.

To begin:

This application form shall be used to apply for all solid waste land disposal facility permit renewals. Renewal application fe are established by IC 13-20-21. Pursuant to IAC 10-11-4(a), this application must be received by the Commissioner of the Indiana Department of Environmental Management at least 120 days prior to the expiration date of your current permit. Please note the draft date of this form next to the page number; if you have received this form more than 6 months after this draft date it is recommended you contact our office at 317-232-0066 to determine if this form is still current. When completed please return this form and support documents to:

LAND FILL

Solid Waste Permits Section
Office of Land Quality (N1154)
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Section A. Permittee(s) Information

Name: Dalton Corporation - Warsaw Manufacturing Facility.				
Address: Street: 1900 East Jefferson St.	Apt. #	P.O. Box: P.O. Box 1388	Town/City: Warsaw	
State: IN	Zip Code: 46581-1388 (P.O. Box) 46580 (Street)	Telephone Number (with area code): (219) 267-8111		

Section B. Facility Owner(s) Information

Name: Dalton Corporation				
Mailing Address: Street: 3755 Lake City Highway	Apt. #	P.O. Box: P.O. Box 230	Town/City: Warsaw	
State: IN	Zip Code: 46581-0230 (P.O. Box) 46580 (Street)	Telephone Number (with area code): (219) 267-8111		

Section C. Operator(s) Information

Name: Dalton Corporation - Warsaw Manufacturing Facility				
Mailing Address: Street: 1900 East Jefferson	Apt. #	P.O. Box: P.O. Box 1388	Town/City: Warsaw	
State: IN	Zip Code: 46581-1388(P.O. Box) 46580 (Street)	Telephone Number (with area code): (219) 267-8111		

Section D. Property Owner(s) Information

Name: Dalton Corporation				
Mailing Address: Street: 3755 LAke City Highway	Apt. #	P.O. Box: P.O. Box 230	Town/City: Warsaw	
State: IN	Zip Code: 46581-0230(P.O. Box) 46580 (Street)	Telephone Number (with area code): (219) 267-8111		

Please note that in accordance with 329 IAC 10-13-4(b) the owner, operator & permittee of a solid waste land disposal facility, and the owner or owners of the land upon which facility is located, shall be liable for any er onmental harm caused by the facility.

Section E. Facility Information

Facility Name:				Permit Number:
Dalton Alternate Site Monofill				FP43-6
Mailing Address: Street	Apt. #	P.O. Box	Town/City	
1900 East Jefferson		P.O. Box 1388	Warsaw	

Facility Contact Person and Telephone Number (with area code):
Barry Fordanish (219) 267-8111

Type of Operation:

[ ]	Sanitary Landfill (Municipal Solid Waste Landfill)	[ ]	Restricted Waste Site Type I
[ ]	Sanitary Landfill (Non-municipal Solid Waste Landfill)	[ ]	Restricted Waste Site Type II
[ ]	Construction/Demolition Site	[X]	Restricted Waste Site Type III

Acres Permitted for Waste Disposal:	Remaining Life of Facility in Years:	Daily Amount Received - Cu Yds. or Tons per Day:
68.4	6	350-400 tons

Type of Waste Received:
Foundry Waste - Type III

Section F. Names and Addresses of Affected Government Officials

1) Members of the board of county commissioners where facility is located

Typed Name: Avis Gunter
Typed Address: 100 W. Center
Typed Address: Room 12
Typed City, St.: Warsaw, IN 46580
Zip

Typed Name: W. E. Creighton
Typed Address: 100 W. Center
Typed Address: Room 12
Typed City, St.: Warsaw, IN 46580
Zip

Typed Name: Brad Jackson
Typed Address: 100 W. Center
Typed Address: Room 12
Typed City, St.: Warsaw, IN 46580
Zip

Typed Name:
Typed Address:
Typed Address:
Typed City, St.:
Zip

Typed Name:
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Typed City, St.:
Zip

Typed Name:
Typed Address:
Typed Address:
Typed City, St.:
Zip

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

LANDOWNER NOTIFICATION ATTACHMENT

In the space below and on any additional paper, as needed, please submit the names and addresses of property owners that adjoin the solid waste facility for which a permit is being submitted. Please also include the names and addresses of individuals who may be affected by IDEM's permit decision. Failure to submit this information will cause delay in processing of your application. When completed, please submit this form with your application to:

Solid Waste Permits Section
Office of Land Quality
Indiana Department of Environmental Management
100 North Senate Avenue, Suite 1154
P.O. Box 6015
Indianapolis, Indiana 46206-6015

Typed Name: Charles & Ruth Haffner
Typed Address: 3331 W. 200 S.
Typed Address:
Typed City, St.: Warsaw, IN 46555
Zip

Typed Name: Sydney & Sharon Martin
Typed Address: 21 Shady Spring Dr.
Typed Address:
Typed City, St.: Doyleston, PA 18901
Zip

Typed Name: Wildlife Habitat c/o
Typed Address: Wayne Township Trustee
Typed Address: 100 W. Center Street
Typed City, St.: Warsaw, IN 46555
Zip

Typed Name: CB Farms IIC
Typed Address: 4217 W. Old Rd. 30
Typed Address:
Typed City, St.: Warsaw, IN 46580
Zip

Typed Name: Phillip M. Brown
Typed Address: 5464 S. Kinzy Road
Typed Address:
Typed City, St.: Claypool, IN 46510
Zip

Typed Name: Clayton & Millicent Stone
Typed Address: 2987 W. 200 S.
Typed Address:
Typed City, St.: Warsaw, IN 46580
Zip

Typed Name: Richard & Linda Creamer
Typed Address: 2987 W. 200 S.
Typed Address:
Typed City, St.: Warsaw, IN 46580
Zip

Typed Name: Robert & Lisa Hay
Typed Address: 2114 S. SR 25
Typed Address:
Typed City, St.: Warsaw, IN 46580
Zip

Typed Name: Levi Rentals
Typed Address: 1210 Hilltop #3
Typed Address:
Typed City, St.: Warsaw, IN 46580
Zip

Typed Name: Kent & Sandy Stouder
Typed Address: 2906 W. 250 S.
Typed Address:
Typed City, St.: Warsaw, IN 46580
Zip

Typed Name: James & Serita Stouder
Typed Address: 2880 W. CR 250 S.
Typed Address:
Typed City, St.: Warsaw, IN 46580
Zip

Typed Name: Max & Linda Schultz
Typed Address: 2712 W. CR 250 S.
Typed Address:
Typed City, St.: Warsaw, IN 46580
Zip

Typed Name: Marc & Michelle Vosler
Typed Address: 2796 W. CR 250 S.
Typed Address:
Typed City, St.: Warsaw, IN 46580
Zip

Typed Name: Zona Hatfield
Typed Address: P.O. Box 105
Typed Address: 105 W. Fifth Street
Typed City, St.: Peru IN 46970
Zip

Typed Name: Elmer & Joyce Leek
Typed Address: 2986 W. CR 250 S.
Typed Address:
Typed City, St.: Warsaw, IN 46580
Zip

Typed Name: Mary Ann Orr
Typed Address: 2537 W. CR 250 S.
Typed Address:
Typed City, St.: Warsaw, IN 46580
Zip

Typed Name: Ricky & Debra Riddle
Typed Address: 2768 S. SR 25
Typed Address:
Typed City, St.: Warsaw, IN 46580
Zip

Typed Name: Erick & Viola Lisdat
Typed Address: 3138 450 W.
Typed Address:
Typed City, St.: Warsaw, IN 46580
Zip

Typed Name:
Typed Address:
Typed Address:
Typed City, St.:
Zip

Typed Name:
Typed Address:
Typed Address:
Typed City, St.:
Zip

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
SOLID WASTE FACILITY PERMIT APPLICATION & REGISTRATION

FEE TRANSMITTAL FORM 47215

To begin:

Please read the instruction manual before beginning. This form shall be used to transmit fees for all solid waste management facility permits, applications (NEW permits, RENEWALS of permits, MAJOR and MINOR MODIFICATIONS of permits) and registrations. The current fee schedule was established by Ind. Code § 13-20-21-2 through 13-20-21-3, and is to accompany all payments. Make check or money order payable to the Indiana Department of Environmental Management. Upon completion, return this form and appropriate fees to the following address:

Cashier's Office (N1324)
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 7060
Indianapolis, Indiana 46206-7060

NOTE: A COPY of your check and a COPY of this fee transmittal form must be attached to your permit application or registration. Submit application or registration materials to:

Solid Waste Permits Section
Office of Land Quality (N1154)
Indiana Department of Environmental Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

Section A. Applicant(s) Information

Name: Dalton Corporation -- Warsaw Manufacturing Facility		
Mailing Address: Street: P.O. Box 1388 (1900 East Jefferson Street)		City: Warsaw
State: IN	Zip Code: 46581-1388 (P.O. Box) 46580 (Street Address)	Telephone Number (with Area Code): (219) 267-8111
Facility Name and County: Dalton Alternate Site Monofill - Kosciusko County		

RECEIVED
APR 5 2000
DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
OFFICE OF LAND QUALITY

Section B. Solid Wa: Permit Fee Schedule

The following fees are to accompany applications and registrations.

Applications	Permit Application for New Sites and Major Modifications	Renewal	Minor Modifications
Sanitary Landfill (including MSWLF's and non-MSWLF's)	☐ $31,300	☐ $15,350	☐ $2,500
Processing Facility			
Transfer Station	☐ $12,150	☐ $2,200	☐ $2,500
Other Processing	☐ $12,150	☐ $2,200	☐ $2,500
Incinerators	☐ $28,650	☐ $5,900	☐ $2,500
Restricted Waste Site Type I	☐ $31,300	☐ $15,350	☐ $2,500
Restricted Waste Site Type II	☐ $31,300	☐ $15,350	☐ $2,500
Restricted Waste Site Type III	☐ $20,000	☒ $7,150	☐ $2,500
Construction/Demolition Sites	☐ $20,000	☐ $7,150	☐ $2,500
Registrations			
Waste Tire Storage	☐ $500		
Waste Tire Processing (i.e. cutting, shredding, etc.)	☐ $200	☐ $200	
Waste Tire Transportation	☐ $25		

DALTON CORPORATION

Warsaw Manufacturing Facility
P.O. Box 1388 • Warsaw, IN 46581-1388

NATIONAL CITY BANK
OF INDIANA

20-6
740

NO. 071043

VOID 1 YEAR FROM DATE OF ISSUE

DATE 3/17/00

71043

AMOUNT
$ *****7,150.00

PAY
SEVEN THOUSAND, ONE HUNDRED FIFTY AND NO/100 ********** DOLLARS

TO THE ORDER OF
IN DEPT OF ENVIR. MGT. 000003992
CONTROLLER DEPT.-ATTN: CASHIER
IN GOVERNMENT CNT.N. PO 7060
INDIANAPOLIS IN 46206-7060

⑈071043⑈ ⑆074000065⑆38⑈000⑈128⑈2⑈

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
SOLID WASTE FACILITY PERMIT CHARACTER DISCLOSURE STATEMENT

GOOD CHARACTER FORM SWF-7

This form shall be used to submit the good character disclosure statement required by IC 13-19-4 for obtaining a solid waste facility permit. Upon completion submit this form with all additional material to the following address:

ATTENTION: Solid Waste Facility Permit Character Disclosure
Office of Land Quality
Indiana Department of Environmental Management
100 North Senate Avenue Suite 1154
P.O. Box 6015
Indianapolis, Indiana 46206-6015

SECTION A: FACILITY INFORMATION

Facility Name	Dalton Corporation - Warsaw Manufacturing Facility			
Mailing Address	P.O. Box 1388 (Street)			
	Warsaw (City)	Kosciusko (County)	IN (State)	46581-1388 (Zip)

This statement is for the purposes of:

___ A new permit
___ A permit modification
X A permit renewal
___ A permit transfer

SECTION B: APPLICANT INFORMATION

The applicant may be an individual, a corporation, a partnership, or a business association that applies for the issuance, renewal, transfer, or major modification of a permit described in IC 13-15-1-3. Each applicant shall complete the following information; attach additional pages as necessary.

Applicant Name	Dalton Corporation, Warsaw Manufacturing Facility			
Business Address	P.O. Box 230 (Street)			
	Warsaw (City)	Kosciusko (County)	IN (State)	46581-1388 (Zip)

Social Security Number (or Federal Tax Number if Applicant is not an individual): 35-2054775

SECTION C: RESPONSIBLE PARTY INFORMATION

A responsible party may be an officer, a corporation director, or a senior management official of a corporation, partnership, or business association that is an applicant. A responsible party may also be an individual, a corporation, a partnership, or a business association that owns, directly or indirectly, at least a twenty percent (20%) interest in the applicant. Each responsible party shall complete the following information; attach additional pages as necessary.

Applicant Name _____

Business Address _____
Street

_____
City County State Zip

Social Security Number _____
(or Federal Tax Number if Applicant is not an individual)

Relationship to Applicant _____

Applicant Name _____

Business Address _____
Street

_____
City County State Zip

Social Security Number _____
(or Federal Tax Number if Applicant is not an individual)

Relationship to Applicant _____

Applicant Name _____

Business Address _____
Street

_____
City County State Zip

Social Security Number _____
(or Federal Tax Number if Applicant is not an individual)

Relationship to Applicant _____

SECTION D: DISCLOSURE STATEMENT

Each Applicant and Responsible Party identified in Sections B and C shall complete a separate Section D and Section E. The Section D requirement may be satisfied by providing all information required by either Section D1 or Section D2. Please indicate that the required item has been provided or does not apply by initialing in the space provided.

THIS DISCLOSURE STATEMENT IS PROVIDED FOR:

Name (print or type) Dalton Corporation - Warsaw Manufacturing Facility

Acting as Applicant or Responsible Party (specify) Applicant

SECTION D1:

A) The information concerning legal proceedings that is required under Section 13 or 15 (d) of the Securities Exchange Act of 1934 (15 U.S.C. 78a et seq) and that the applicant or responsible party has reported under Form 10-K.

Not Applicable_____ Provided_____

B) A description of all judgments that have been entered against the applicant or responsible party in a civil or administrative complaint for the violation of any state or federal environmental protection law and that have imposed upon the applicant or responsible party a fine or penalty of more than ten thousand dollars ($10,000) within five (5) years before the date of the submission of the application.

Not Applicable_____ Provided_____

C) A description of all judgments of conviction entered against the applicant or responsible party for the violation of any state or federal environmental protection law within five (5) years before the date of submission of the application.

Not Applicable_____ Provided_____

SECTION D2:

A) A description of the applicant's or responsible party's experience in managing the type of waste that will be managed under the Permit. Include the name and business address for employers, the State Permit number for the facility, the type of work experience and the length of time employed.

Not Applicable_____ Provided P

B) A description of all civil or administrative complaints against the applicant or responsible party for the violation of any state or federal environmental protection law that have resulted in a fine or penalty of more than ten thousand dollars ($10,000) within five (5) years before the date of the submission of the application.

Not Applicable_____ Provided P

C) A description of all civil or administrative complaints against the applicant or responsible party for the violation of any state or federal environmental protection law that allege an act or omission that constitutes a material violation of state or federal environmental protection law and that presented a substantial endangerment to public health or the environment.

Not Applicable N/A Provided_____

D) A description of all pending criminal complaints alleging the violation of any state or federal environmental protection law that have been filed against the applicant or responsible party within five (5) years before the date of submission of the application.

Not Applicable N/A Provided_____

E) A description of judgments of criminal conviction entered against the applicant or responsible party within five (5) years before the date of submission of the application for the violation of any state or federal environmental law.

Not Applicable N/A Provided _____

F) A description of all judgments of criminal conviction of a felony constituting a crime of moral turpitude under the laws of any state or the United States that are entered against the applicant or responsible party within five (5) years before the date of submission of the application.

Not Applicable N/A Provided _____

G) The location of all facilities at which the applicant or responsible party manages the type of waste that would be managed under the permit to which the application refers. Include the facility name, business address, any permit numbers and the type of facility.

Not Applicable _____ Provided P

H) The following information will be used by IDEM to complete a Request for Limited Criminal History Information if additional information concerning an operator or responsible party is determined to be necessary.

Date of birth 11-3-52 Sex Male Race Caucasian

SECTION E: SIGNATORIES

I affirm that all information contained in this disclosure statement and any attachments is, to the best of my knowledge, true and accurate. I also realize that any information provided in this disclosure statement that was knowingly incorrect may subject me to the penalty for perjury under IC 35-44-2-1.

Barry Fordanish
APPLICANT/RESPONSIBLE PARTY

3/31/00
DATE

ACKNOWLEDGMENT

State of INDIANA)
)SS
County of KOSCIUSKO)

Before me, the undersigned, a Notary Public in and for said County and State, personally appeared Barry Fordanish, known by me to be the person who executed the foregoing instrument, signed the same and acknowledged to me that he/she did so sign the same, and that his/her free act and deed and that the statements made in the foregoing instrument are true.

IN WITNESS WHEREOF, I have set my hand and official seal this 31st day of March, 2000.

I am a resident of _____ County, _____

Notary Public GERETTA L GREENE
NOTARY PUBLIC STATE OF INDIANA
KOSCIUSKO COUNTY
MY COMMISSION EXP. JULY 14,2001

My Commission Expires:

APPLICANT'S DISCLOSURE STATEMENT

Section D2:

A) Dalton Corporation, Warsaw Manufacturing Facility ("Dalton") has been permitted by IDEM under Operating Permit #43-6 to operate a restricted waste site for disposal of foundry materials since 1987. A previous renewal was issued in 1995. Barry Fordanish has been employed by Dalton in the position of Environmental Engineer since 1996. His responsibilities include the operation of the restricted waste site. Mr. Fordanish is licensed as a Solid Waste Land Disposal Facility Operator under certificate # 0182.

B) An Agreed Order was entered into between IDEM and Dalton on October 28, 1999. Dalton informed IDEM that it had discovered an overfill of its restricted waste site. Dalton applied for and was granted a minor modification to its permit to include a height increase. Dalton paid a civil penalty over $10,000 to resolve the matter without a hearing, adjudication or admission of any issue of fact or law.

C) None.

D) None.

E) None.

F) None.

G) Dalton Corporation, Warsaw Manufacturing Facility operates a solid waste restricted waste site, know as the Alternate Site Monofill, for the placement of its foundry wastes located at the junction of State Road 25 and County Road 250 South located in Kosciusko County, Indiana.

Indiana Department of Environmental Management
Indianapolis
Good Character Disclosure Statement Form
329 IAC 10
Instructions

Introduction

Under IC 13-19-4, an application for the issuance, renewal, transfer or major modification of a solid waste permit (except for transfer stations, see below) can only be granted if a **good character disclosure statement** is properly submitted. The following instructions detail how to submit your good character disclosure statement in accordance with IC 13-19-4. **Please note that in accordance with IC 13-19-4-1, you do not have to submit a good character disclosure statement if your application is for a transfer station.**

Good Character Disclosure Statement Form (SWF-7)

ALL applicants (except for transfer stations) must fill out this form.

The solid waste facility permit character disclosure statement form shall be used to submit the disclosure statement as required by IC 13-19-4. The statute requires that each permit applicant and responsible party submit a character disclosure statement prior to the issuance of an original permit, a permit renewal, a major modification of the permit or a permit transfer. Each applicant and responsible party shall submit a separate disclosure statement for each facility and/or company which is required to submit a character disclosure statement.

A. Facility Information (Section A)

For all submissions, place the name and address of the facility in the spaces provided. Indicate, in the space provided, the reason or reasons for the submission of the disclosure statement.

B. Applicant Information (Section B)

For all submissions, place the name of the applicant, the business address of the applicant and the social security number (or federal tax number if the applicant is not an individual) of the applicant in the spaces provided. An applicant is an individual, a corporation, a partnership, or a business association that applies for the issuance, renewal, transfer, or major modification of a permit described in IC 13-15-3. This includes solid waste landfills, processing facilities and incinerators. For the purposes of the disclosure statement, the applicant is the person or company in whose name the permit is issued. Each applicant shall complete the required information; attach additional pages as necessary.

C. Responsible Party Information (Section C)

For all submissions, place the name of the responsible party, the business address of the responsible party, the social security number (or federal tax number if the responsible party is not an individual) of the responsible party and the relationship of the responsible party to the applicant in the spaces provided. For purposes of the disclosure statement, a Good Character Disclosure Statement Instructions

responsible party may be an officer, a corporation director, or a senior management official of a corporation, partnership, or business association that is an applicant. A responsible party may also be an individual, a corporation, a partnership, or a business association that owns, directly or indirectly, at least a twenty percent (20%) interest in the applicant. Each responsible party shall complete the required information; attach additional pages as necessary.

D. Disclosure Statement (Section D)

Each operator and responsible party shall provide his/her name and indicate whether they are an operator or a responsible party in the spaces provided.

1. **Section D1:**

   Section D1 shall be completed by indicating the appropriate responses to Items A through C by placing the initials of the person filling out the form in the spaces provided. For the purposes of completing the section, entering "Not Applicable" is taken to be a non-affirmative response to a request for information in Items A through C. Section D1 may be used **only** by those applicants and/or responsible parties which file a Form 10-K with the Securities and Exchange Commission. **At no time may an individual complete Section D1 to satisfy the character disclosure requirements.** Any information provided on additional pages should be identified by the appropriate item letter.

2. **Section D2:**

   Section D2 shall be completed by indicating the appropriate responses to Items A through G by placing the initials of the person filling out the form in the spaces provided. For the purposes of completing the section, entering "Not Applicable" is taken to be a non-affirmative response to a request for information in Items A through G. The information requested in Item H will be used to complete a Request for Limited Criminal History Information if additional information concerning an operator or responsible party is determined to be necessary. Any additional information provided on additional pages should be identified by the appropriate item letter.

E. Signatories (Section E)

Each applicant and responsible party shall complete a Section E, **in original,** for **each** disclosure statement that is submitted. In addition, each completed Section E shall include a properly completed and notarized Acknowledgment.